

SURVEY OF RESPONSIBLE GAMBLING MEASURES

PRINCIPAL – Swedish Online Gambling Association – [Branschföreningen för Onlinespel – BOS]

AUTHOR – Senior Lecturer Anders Tengström and Dr Anna-Karin Rybeck – Karolinska Institutet

ASSIGNMENT

Mazelab AB was tasked by the Swedish Online Gambling Association (BOS) to conduct a survey of responsible gambling with five of the association's members in comparison with companies licensed by the Gaming Board or the Swedish state to operate online in Sweden. This engagement was carried out by Senior Lecturer Anders Tengström and Dr Anna-Karin Rybeck, both associated to Karolinska Institutet – Department of Clinical Neuroscience.

PURPOSE

The purpose of this survey is to make a comparison between the regulated online market in Sweden and five members of the Online Gambling Association (BOS) regarding responsible gambling measures from a customer perspective, based on the European Committee for Standardization (CEN) standard for responsible gambling (CEN Workshop Agreement on Responsible Remote Gambling Measures, CWA 16259).

COMPANIES INCLUDED IN THE SURVEY

Members of BOS

1. PAF – www.paf.se
2. Betfair – www.betfair.se
3. Betsson – www.betsson.se
4. Unibet – www.unibet.se
5. Bonnier Gaming – www.vinnarum.se

Companies in the regulated market in Sweden

1. Svenska Spel AB – Has a licence to operate online in Sweden – regulated by the government – www.svenskaspel.se
2. ATG – Has a licence to operate online in Sweden via a licence from the Gaming Board – www.atg.se
3. Postcode Lottery – Licence from the Gaming Board – www.postkodslotteriet.se

METHOD AND DESIGN

The companies' responsible gambling has been compared with the internationally agreed CEN standard in order to provide a common basis for mapping and analysis. The CEN standard is appended to this report.

We have followed and carried out a survey in relation to the paragraphs of the CEN standard that are relevant to evaluation in the context of this engagement, i.e. paragraphs 1 and 2, which include measures intended to protect vulnerable customers from the negative effects of gambling (paragraph 1) and to protect minors from all forms of gambling (part 2).

CEN is a European standardization body consisting of members from over 30

countries. The current standard for responsible gambling measures are the result of an agreement between 27 stakeholders in gambling, including trade associations, regulatory authorities, experts on gambling behaviour (Harvard Medical School) and gambling problems (G4), gambling organizations, software suppliers, and gaming companies. In developing the standards, stakeholders took into account available research and some of the national regulations available (CEN, Annex A). The purpose of the CEN standard for responsible gambling is to establish levels of intervention to protect customers and to ensure that online operators, software distributors and gambling companies' personnel provide responsible gambling products to their customers. The standard is also designed to facilitate guidelines for individual countries by companies offering measurable levels and interventions that are comparable in their efforts to establish a safe online gambling environment (CEN/CWA p.6). It is important to note that the standard should not be seen as a regulation or rule, but as a voluntary agreement between a number of different organizations and companies with an interest in issues related to responsible online gambling.

The following approach has been used for this survey and analysis:

1. Open source information that is available on the websites of the respective companies relating to socially responsible gambling practices was analysed.

The gambling site(s) of the companies along with any issued written material were systematically examined on the basis of how the responsible gambling tools and features function and how the customers access these.

The compilation of CEN/CWA was initially carried out for each company and is presented below between BOS members compared with the companies that are registered online distributors with licences or permits to operate in the Swedish market.

2. Review of how gambling information and responsible gambling tools are activated/made available at the start of play. The responsible gambling measures of all of the companies included in the study have been compiled on the basis of the various paragraphs of the CEN/CWA standard.
3. Interviews were also conducted with the person in each company in charge of responsible gambling (see the Annex). One company, however, declined participation in this aspect.
4. The results of the survey are discussed based on the current state of knowledge regarding today's responsible gambling issues in Sweden and internationally.

Note that the security systems within the respective companies have not been examined, e.g. what happens if an attempt is made to breach the rules etc. that were agreed upon when the account was registered. Within the scope of this study, only the features, tools and available information regarding responsible gambling practices for low-activity gamblers with gambling accounts were tested.

This survey is therefore based partly on open information that can be accessed via the gambling site(s) of the respective companies and published material available to a

potential customer of the company, and partly on interviews with relevant gaming company personnel. By only using open information that the companies have provided, a fair basis for comparison is ensured for the companies included in the study.

Limitations of the study regard any foreign-language material (i.e. non-Swedish), which is only commented upon, but all Swedish material has been included in the analysis.

The information has been compiled and verified internally by Mazelab AB and reconciled and supplemented with calls to the customer service departments of each company.

Design

All points in paragraphs 1 and 2 of the CEN standard have been tested against all the companies in the survey. For each point, the assessor has examined the available information on the respective gambling site(s) in order to determine whether or not the point in question was satisfied in accordance with the standard. If the point was considered satisfied, it was marked 1. If it was not considered satisfied, it was marked 0. The assessment has been strict in the sense that no consideration has been given to the context of the information, how easy or difficult it was to find, or the quality of the design and content. The appraisal has only been concerned with whether or not the point is satisfied in a formal sense. Furthermore, initial assessments were subject to further verification with each company's customer service department. Internal control of data was performed by at least two persons assessing each company's responsible gambling measures.

A compilation of the companies' responsible gambling according to the CEN standard was carried out to create transparency. Based on this compilation, a more comprehensive analysis was then performed where comparisons with the CEN standards were made at group level, i.e. the BOS companies were compared with regulated companies in Sweden. The findings of this report have been extracted from Excel files to answer the question of this investigation at group level, i.e. do the responsible gambling measures of the five BOS members differ from regulated companies in the Swedish market. The smallest unit of analysis is therefore the group, and no individual companies have been singled out, whether in a positive or a negative sense.

RESULTS

This review found that the majority of the relevant CEN standard paragraphs (paragraphs 1 and 2, as included in this report) were essentially satisfied. This applies to both the BOS members and the companies licensed to operate in the Swedish market. No clear or general difference was therefore found between the BOS members and companies in the regulated Swedish market.

It is our opinion that all of the companies aim to exercise responsible gambling practices, in that they all have dedicated pages that provide information on the risks of gambling, tools for responsible gambling, etc. (CEN/CWA 1.01, 1.01.01, 1.01.02, 1.01.03, 1.01.04).

All companies provide tools that enable gamblers to learn about and to control their gambling (CEN/CWA 1.01.05, 1.01.06, 1.01.07). The companies that are included in the study have not all developed their intentions in the same way and are at different stages of progress in this area. We also found some shortcomings with individual companies in a number of areas; for example, in some cases there is no provision for self-testing, (CEN/CWA 1.01.05), the information regarding remaining player funds is not clear (CEN/CWA 1.06), and some tools and information are more difficult to access than others. However, we have not observed any difference here at group level, that is to say, between the companies that hold licences for online gambling in Sweden compared to BOS members.

It is possible to set limits on stakes and some companies also have an upper limit for accepted stakes (CEN/CWA 1.10-1.12), although there are differences between companies in how actively this is conveyed to the customer.

The majority of the companies, though not all, provide cooling-off and self-exclusion periods of various durations (CEN/CWA 1.13-1.18). Several companies also offer assistance in the form of CBT-based self-help programmes, and even CBT-based therapy. This applies to both groups.

The CEN (1.20) standard also states that every company shall have a dedicated senior manager for responsible gambling issues, which we have found in the majority of companies, though not all.

We also found that all companies comply with the requirements for verification and identification of persons in order to reduce the possibility of under-age gambling and of a person opening multiple accounts with the same company (CEN/CWA 2.02-2.07). We found, however, that there are some companies that do not offer customers filters and assistance with external programs to prevent under-age gambling (CEN/CWA 2.02). All companies have a clear policy regarding an 18-year age limit for gambling (CEN/CWA 2.01, 2.03).

One of the clear differences observed between different companies (but not between the groups) is the extent to which the customer is included in the active and conscious choice of gambling measures. There is a spread in this area ranging from companies having compulsory stages for the customer to reflect over different limits for their gambling, to companies whose information and tools are more difficult for customers to access and where the customer has to actively search for information. This in turn requires that the customer knows what to look for.

We also see a spread in the extent to which the companies have produced and made available policies for action to be taken when it is suspected that people are attempting to circumvent the rules on, for example, certain age limits, opening more than one account, etc. (CEN/CWA 2.10-2.12). There is information available that this is illegal and that the companies that participated in the interview have been able to present action plans for discovery of and actions against under-age gambling (CEN/CWA 02.10).

DISCUSSION

This study therefore found that the companies participating in the study essentially satisfied the requirements stipulated in the CEN standard and that there were no systematic or clear differences at group level between the companies belonging to BOS and those that currently operate under licence or with permits in Sweden.

However, it can be stated that there is a qualitative difference in how well, to what extent and in what manner the gambling companies work with issues relating to responsible gambling practices. The qualitative spread is present within both of the groups and can be attributed to different elements of the responsible gambling practices. Some examples are listed below:

1. How companies present their overall responsible gambling efforts – here we see a difference, from companies that actively invite and even require participation in responsible gambling initiatives, to companies with information and interventions available for customers who know what to look for, which requires that customers are well informed and competent and have an understanding of the purpose of any interventions or restrictions.
2. We can state that irrespective of how the companies communicate their general activities relating to responsible gambling practices and how they make their tools available to their customers, there are differences in the information and guidance provided to customers on responsible gambling practices. There is often a lack of a clearly communicated overall concepts or models for the customer to consider as regards the structure of the responsible gambling practices. Some information has been more difficult to locate at some companies than others. For example, there are rules for self-exclusion in the material of the comprehensive customer agreement that is approved when an account is opened. There are differences, but once again, we have not found any overall differences at group level.
3. We have also found a range of differences in how the companies present the necessity for responsible gambling measures: what is the rationale, and what impact can be expected from these measures.

Since responsible gambling tools are aids to achieve safe and positive gambling, we consider it important that the tools are explained to the customer and that information is available on what help they could potentially provide to the customer. There was little information available in terms of this on the websites of the vast majority of the companies, which makes it difficult for the customer to understand why certain measures should or should not be selected. It is also unclear on the websites which tools and/or interventions are recommended for whom and when. There is also a lack of information on the expected impact of these tools.

Naturally, there are also different options to control gambling behaviour/limits or information, depending on the type of gambling that is involved. However, it is not always clear to the customer when and how different specific interventions are activated, e.g. the option for session times is available in some cases for casino gambling. However, it is a positive point that gambling companies use tools differently

depending on the risk associated with various forms of gambling, particularly taking into account the FHI's risk assessment for the differences in risk between different types of games (FHI, 2012). There are probably differences between lotteries and casinos games offered online, and it is therefore natural that different degrees of control mechanisms are activated depending on the type of gambling involved.

Standards

Online gambling has been considered to be one of the most risk-associated types of gambling, where many customers report negative consequences of their gambling (FHI 2010). All the companies in this study have implemented responsible gambling measures that have the potential to help gamblers manage the risks associated with online gambling. Agreeing on standards within the gambling industry is one way of implementing systematic responsible gambling activities.

In this context, we must not forget the inherent problem associated with all types of standards and certification processes, namely that the standard can easily come to act as a minimum level and that gambling companies who wish to continue to operate over and above the levels of the standard do not, as has been stated, find any guidance on how to proceed. One way to remedy this could be for future standards to specify different levels and features of responsible gambling, so that there is always room for improvement on all the points of the standard.

The gambling sites of the various companies specify their organisational affiliation with regard to responsible gambling issues. For example, it can be seen that some of the companies within BOS are members of organisations such as EGBA, where membership requires compliance with the CEN standard. The CEN standard is certified using the independent body eCOGRA, which conducts annual external evaluations in relation to the CEN standard. All companies in BOS have declared their support for the CEN standard.

Sweden has an equivalent to the CEN standard in the SPER ethical guidelines for responsible gambling. All the companies included in SPER have accepted the standard, but these companies are at different stages of compliance with the measures contained in the standard. Not all companies with licences or permits in Sweden are members of SPER, and their evaluations in relation to the standard take place by means of self-appraisal and self-regulation. It is therefore evident that an external review of responsible gambling issues by a certified body has greater credibility with the authorities, the customers and other stakeholders than self-inspection measures carried out by the company alone.

At the time of writing, the European Commission is working on a recommendation for responsible gambling which is scheduled for publication in 2013. This document may be relevant in various ways to the regulation of the Swedish gambling market, as well as to how gambling companies tackle the issue of responsible gambling.

Gambling problems in Sweden

The national unified effort that exists in Sweden to combat gambling addiction has been led by the National Institute of Public Health (FHI) since 1999. Knowledge gathering has taken place in several ways, primarily through means of a large population study, the Swedish Longitudinal Gambling Study (SWELOG), that the FHI has built up and operated since 2007, and which includes measurements of the population in terms of gambling

behaviour and gambling issues, and the consequences of gambling. The study shows that the percentage of people playing for money has decreased from 88% to 70% over the past decade. The decrease is consistent with results from several international studies. The study also notes that the revenue from the Swedish regulated gambling market remains at the same level as before, and to this should be added the very likely increase in gambling for companies not regulated in Sweden (FHI, 2011).

SWELOGS shows that 2% of people have problems with gambling, and another 5% have some risk of developing gambling problems. Furthermore, the SWELOGS report states that 'gambling problems exist throughout the population but that there are differences between different population groups' (FHI, 2011). Given the results from SWELOGS, gambling addiction/problems are classified as a public health problem and are therefore given the status of a phenomenon that the FHI and other authorities will work to prevent, treat and mitigate the consequences thereof.

Online gambling problems

It is now regarded as beyond any scientific doubt that there is a link between online gambling and gambling problems. This insight has been developed through knowledge from a large number (approximately 20) of population studies carried out in European countries and North American states/provinces (see Wood et al, 2012 for complete references).

It is important in this context to point out that the link that exists between online gambling and gambling problems is not necessarily causal, i.e. that online gambling causes gambling problems. There are several difficulties in establishing the possible role of online gambling in the development of gambling problems. Perhaps the most important point is that online players, to a very large extent, also play on land-based gambling (see e.g. McBride et al, 2009). Furthermore, persons with gambling problems also tend to play on a wide variety of game types with different distribution properties (see e.g. SWELOGS, 2010). Some studies that attempt to map out causality have found that when taking into account how many games in which the problem player is involved, the connection between online gambling and gambling problems disappears (see e.g. Vaughan Williams, 2008). Generally, however, knowledge of causality is still far too low to conclude anything definitive, and knowledge of this issue can only really be developed in studies where the players' total objective gambling history is analysed from a gambling addiction perspective. Such studies are possible, for example, where most gambling is via individual playing cards.

In the studies that analysed actual gambling data for online gambling, it can be ascertained that the overwhelming majority of players play with relatively small stakes in relatively few games and with limited losses, and that gambling decreases over time from an already modest level. The opposite is true for 1-5% of the players, however. They are an extreme group compared with the others and they play for large sums in many games and increase their gambling over time. However, they lose less than the other players on the site, measured as a percentage (see e.g. Laplante et al, 2008).

Looking at online gambling from a responsible gambling perspective, it can be noted that depending on the given customer base, online companies should be particularly vigilant with regard to some of its customers' gambling so as not to cause unreasonable consequences for them. Fortunately, online companies have a unique opportunity to use

their saved gambling history to produce knowledge based on their customers' gambling activities and, through various statistical models, predict with relatively high precision who will be at risk of developing gambling problems. Other methods that have been tried include, based on customers' contact with online companies' customer services, creating predictive models to provide feedback on self-exclusion to avoid gambling problems (Haefeli, 2011).

Treatment

Like everything, it is necessary to first create awareness that a problem exists, determine whether it is possible to address the problem, and then find effective ways to resolve the problem. The National Institute of Public Health has initiated and financially supported research in Sweden on the treatment of gambling problems. Studies have shown that Cognitive Behavioural Therapy (CBT) (including via the internet) and Motivational Interviews (MI) have a positive effect on negative gambling behaviours (Cowlshaw et al 2012; Carlbring, et al 2010).

The treatment of gambling addiction is limited in Sweden at present and very few people can be offered in-vivo treatment with a therapist. It is worth highlighting in this context that it is possible to offer effective internet treatment. Internet-based CBT treatment has been tested and is still currently being tested. Several studies have shown good results. An example of this is found in Carlbring's studies, which show that eight weeks ICBT (internet cognitive behavioural therapy) had positive effects on not only on negative gambling behaviour but also anxiety and depression, and that it increased the participants' quality of life. Carlbring and others have also followed up these people and found that the positive effects lasted up to 36 months after treatment was completed (Carlbring et al, 2012). Several of the companies included in the study currently offer their customers regular treatment or various forms of self-help, with or without support. Just like other responsible gambling activities on offer, it is important to evaluate the effects of this form of responsible gambling measure.

Prevention of gambling problems

Prevention efforts usually mean that various activities and initiatives are used to prevent the problems occurring in the first place. In terms of gambling problems, preventive efforts can be divided roughly into three areas:

- 1) The general population, with activities to provide information, knowledge and encouragement for changes in the behaviour of some people;
- 2) Laws, rules and regulation of gambling and anything else that is associated with gambling; and
- 3) Measures and interventions within gambling itself or in direct connection with it.

In Sweden, there are different actors at the different levels of preventive endeavour. The population-based preventive efforts around gambling problems are currently the direct responsibility of the National Institute of Public Health. The FHI has conducted various forms of preventive work over the years in order to raise awareness of problem gambling in different risk groups, often in small, local projects. It has also and continues to provide financial support for local prevention efforts. The SWELOGS study has also been initiated. This study has already provided knowledge, and will continue to do so, regarding how

future preventive efforts can be designed. A compilation of knowledge has also been produced to map out the existing evidence about preventive efforts and gambling problems (FHI, 201011).

The Swedish Government and Parliament have been active in the area of legislation, rules and various forms of regulation. They also hold the overall responsibility for making important adjustments in the area of gambling, including for example the question of how the gambling market should be regulated, and which body within the healthcare field will be responsible for the treatment of gambling addiction. The state has assistance in the form of the Gaming Board, which oversees the regulated gambling market in Sweden, but the state is also assisted by the municipalities, who grant and monitor licences for lotteries.

As for 3) above, which affects preventive work in the area of gambling, there are no actors with particular responsibility for developing preventive measures in Sweden. Traditionally, neither the government nor the authorities in Sweden concerned themselves with whether or not measures governing or within gaming could be preventive (though there are exceptions to this). Gambling companies have also not traditionally reflected on preventive measures when developing new games or migrating to the internet. Instead, it has been researchers studying gambling and gambling environments who have developed the knowledge that is available today. Sometimes the research has been supported by gambling companies, but not usually.

Today there is no systematic knowledge about which preventive measures function within the three different areas. In order to understand gaming and its requirements, we rely today mostly on knowledge from work in other fields, such as alcohol research or psychological development theory.

The knowledge that does exist regarding the prevention of gambling problems is listed below and comes from a compilation (FAS, 2013), which in turn is based on Williams (2012) and the FHI (2010II). What can be ascertained is that the following measures may in certain contexts help to reduce or prevent gambling problems.

- Structural measures in the form of regulations and governing policies belong to a class of measures that are proven to be effective in reducing the incidence of gambling problems. Examples of activities in this group may be restricting availability, restrictions on opening hours, availability of gaming with a high level of risk, age limits, etc.
- Educational activities for the population in order to limit the proportion of individuals who play in a risky manner and experience problems do not seem to have any success in changing people's actual gambling behaviour. The same efforts have been proven effective, however, in increasing people's awareness of the risks of gambling, which is often considered to be important in itself.
- Warning messages, so-called pop-ups on slot machines may have an effect on gambling behaviour and knowledge about the risks of gambling. However, there are still questions about which messages are working, for what, how long for, and for which individuals.
- A restriction or absence of alcohol in connection with gambling is advised, since the combination of alcohol and gambling has a negative correlation.
- Self-exclusion from casino and online gambling has shown positive effects internationally.

- The possibility to set limits on playing time and loss limits have also shown positive effects.
- Restrictions on the speed and number of betting opportunities (lines) on slot machines and minimizing the so-called 'near win effect' i.e. the illusion that the player is close to a win and that the player can influence the course of play.
- Restriction of access to money during the gambling session, e.g. reduction in the ability to play for credit or to withdraw money from an ATM at the gambling venue.
- Measures that help to break long gambling sessions.

It can be observed from this list that most knowledge/research has been performed on casino operations and gambling machines. There is currently only limited knowledge about preventive measures in online environments, i.e. what works, for whom and under what circumstances. Of course, some of today's knowledge about preventive efforts is also relevant to games distributed online. This includes restrictions on time and money and the design of the games, etc.

Prevention work – The situation in Sweden today

Based on existing knowledge of what preventive measures are effective, one can state, somewhat paradoxically, that the measures that are likely to have the greatest effect in reducing problem gambling are those that the legislator uses the least today. The measures in question are different forms of regulation on the gambling market, as such, but also on the games and gambling environments, i.e. measures that the legislator and its agencies could implement. What research has demonstrated in other countries makes it possible to conclude that this type of action, correctly applied to the Swedish gambling market, would have a preventive effect in terms of gambling problems. Today in Sweden we have a situation where many of the gambling companies that operate in the Swedish market implement voluntary restrictions, such that the legislature could have regulated in a different way, including e.g. age restrictions on certain forms of gambling.

As we discovered, gambling companies that are currently active online in the Swedish market essentially comply with the CEN standard for responsible gambling. This is a reasonable expectation to impose on the gambling industry. But, as the example below shows, one must consider whether this is sufficient.

The National Audit Office report (2012) regarding the role of the government in the gambling market found that *'gambling policy implementation assumes that there is an effective instrument in the form of laws and regulations, including licensing and enforcement, prevention and research, and an effective state gambling company'*.

And that: *'The government's basis for guidance fails in that the government has not to any great extent evaluated the company's work with responsible gambling, which is of great importance in order to achieve the goals'*.

And finally: *'According to the National Audit Office analysis, Svenska Spel does not take adequate account of the risk of gambling addiction and Svenska Spel's operations can therefore support Parliament's objectives in a more efficient manner. This places demands on how the government controls the company and how the company performs their duties'*.

It can be noted that the National Audit Office clearly places the responsibility for achieving

the objectives of gambling policy on the government and parliament, and that on a wide range of points, the latter failed to adopt measures to achieve the targets. However, the audit also shows that gambling companies, in this case Svenska Spel, which is a state instrument for achieving gambling policy, has a direct, substantial and operational responsibility for the implementation of responsible gambling policies and evaluating their effectiveness, which the Audit Office believes is something that Svenska Spel has not done.

In the National Audit Office's view of how the allocation of responsible gambling will apply as a model in a future re-regulation of the Swedish gambling market, it points to two general approaches. The first is that the state must take a broader and more proactive responsibility in order to show, much more clearly than today, how the gambling policy objectives shall be achieved in practice. The second is that the gambling companies covered by the new regulation shall be responsible for demonstrating that the responsible gambling measures have reasonable results, i.e. evaluate their actions.

Regardless of whether the National Audit Office's approach will apply in a new regulation, there is every reason to believe that over time there will be increased pressure from the public, various non-profit organizations, government agencies, etc. for gambling companies to show that they take the negative aspects of gambling seriously by offering preventive measures that are proven to be effective. Just as in the evaluation of psychological treatment, which has long been working to develop and evaluate interventions under the motto 'what works for whom', it is reasonable to envision a trend where gambling companies will in future have to show that their measures work on their games for their client group. This in turn requires different forms of impact evaluations, something that has not been common in the past, but which is now beginning in Sweden. Several of the companies included in this study have started, or intend to start, this type of study to evaluate their responsible gambling tools.

Conclusions

We can conclude:

- That those companies included in the survey essentially comply with the requirements of the CEN standard regarding responsible gambling measures.
- That when we compare BOS companies with those authorised to operate in the Swedish online market, there are no major or systematic differences at group level.
- That there are variations between different companies regarding how well they succeed in implementing the CEN standard. The variations exist within both groups.
- That there seems to be a difference between the way companies view responsible gambling measures and which strategy they use to make these available for their customers.
- That the level of knowledge regarding effective preventive gambling measures is low, not least about what works in the gambling environment for online gambling.
- That preventive gambling initiatives must be based on several actors in a society where gambling companies have a role to play. One way to take on that role seems to be to evaluate the company's responsible gambling operations. A number of companies in this survey have already begun this process.

REFERENCES

Carlbring, P., Degerman, N, Jonsson, J., Andersson, G., (2012) Internet-Based Treatment of Pathological Gambling with a Three-Year Follow-Up, *Cognitive Behavioral Therapy*, volume 41, issue 4, p. 321-334

Carlbring, P., Jonsson, J., Jospelson, H., Forsberg, L., (2010), Motivational Interviewing verses cognitive behavioural therapy in the treatment of problem and pathological gambling, a randomized controlled trial. *Cognitive Behavioral Therapy*, 2010; 39(2), p. 92-103

Cowlshaw S, Merkouris S, Dowling N, Anderson C, Jackson A, Thomas S., (2012) Psychological therapies for pathological and problem gambling (Review), *The Cochrane Library*, Issue 11

CEN WORKSHOP AGREEMENT, ICS 35.240.99; 97.200.99, CWA 16259

Forskningsrådet för arbetsliv och socialvetenskap (2013). Spelberoende – Forskning för en hållbar spelpolitik

Haefeli, J., Lischer, S., & Schwarz, J. (2011). Early detection items and responsible gambling features for online gambling. *International Gambling Studies*, 3, 273-288.

Laplante, D.A., Schumann, A., LaBrie, R.A., & Shaffer, H.J. (2008). Population Trends in Internet Sport Gambling. *Computers in Human Behaviour*, 24, 2399-2414.

McBride, J & Derewenski, J. (2009). Internet Gambling Behavior in a Sample of Online Gamblers. *International Journal of Mental Health and Addiction*, 7, 149-167.

Regeringsbeslut daterat 2011-12-15 gällande ansökan från AB Svenska Spel om tillstånd att anordna lotterier enligt lotterilagen (1994:1000).

Riksrevisionen (2012) *Staten på spelmarknaden – når man målen?* RIR 2012:15

Statens Folkhälsoinstitut, (FHI), (2010) *Spel om pengar och spelproblem i Sverige 2008/2009. Huvudresultaten från SWELOGS befolkningsstudie*. Statens Folkhälsoinstitut, R2010:23

Statens Folkhälsoinstitut, (FHI), (2012) *Spel om pengar och spelproblem i Sverige 2009/2010. Resultat från SWELOGs ettårsuppföljning*. Statens Folkhälsoinstitut R 2012:04

Statens Folkhälsoinstitut (2010II) Att förebygga spelproblem. En kunskapsöversikt och systematisk litteraturöversikt. Östersund Statens Folkhälsoinstitut.

Vaughan Williams, L., Page, L., Parke, J., & Rigby, J. (2008). British Gambling Prevalence Survey 2007: Secondary Analysis. Gambling Commission, UK.

Williams, R.J., West, B.L., & Simpson, R.I. (2012). Prevention of problem gambling: A comprehensive review of the evidence and identified best practices. *The Ontario problem gambling research centre and the Ontario ministry of health and long term care*.

Wood, R.T., Williams, R.J., & Parke, J. The Relationship between Internet Gambling and Problem Gambling. In Routledge *International Handbook of Internet Gambling*, 2012. Routledge, NY, USA.

Senior Lecturer Anders Tengström has worked with gambling issues since 2005 and started the regional Knowledge Centre for Gambling [Kunskapscentrum för spel] at Beroendecentrum in Stockholm 2006. Between 2004 and 2012, Anders Tengström was head of the Forum Research Centre for Psychosocial Health, which included the Knowledge Centre for Gambling. Dr Anna-Karin Rybeck worked at Forum 2009-2012 and served as Deputy Head of the unit 2011-2012. Forum had CPF – Centre for Psychiatry Research, as its principal. In 2011, Anders Tengström was made senior lecturer at Karolinska Institutet's Department of Clinical Neuroscience. Today, Anders runs the company Mazelab AB together with Anna-Karin Rybeck. Both are associated to the Karolinska Institutet as researchers.

Selection of studies/projects run by Anders Tengström and Anna-Karin Rybeck regarding gambling for money:

- Responsible for the National Support Line for gamblers and their relatives 2010-2012
- The dream of independence – treatment study and method development study for adolescents with gambling problems. Run in collaboration with Maria Ungdom 2006-2012.
- In-depth study on gambling and health – part of the National Institute of Public Health's population study on gambling (SWELOGS), which focused on risks and protective factors related to gambling problems 2010-2012.
- Development of methods and operation of outpatient treatment for persons (adolescents and adults) with gambling problems, 2006-2012.

Anders Tengström was appointed by the government to participate as an expert in the government survey on gambling issues, 'Spelutredningen' 2008. He has also been a member of SWELOGS' Advisory Board since 2007 and a member of Svenska Spel's R&D council 2010-12.

Questions to the respective customer service

These issues were addressed by phone/e-mail to the respective responsible gambling manager at the companies who wished to participate in the interviews. The query areas were established to show the areas where we did not think we could readily find information on each company's website.

1. Is the company a member of an international organization that requires a mandatory external audit of the CEN standard? E.g. EGBA and/or has assessment of the responsible gambling work been performed by an international organisation, such as eCOGRA?
2. Paragraph 1 of CEN/CWA – Procedures and standards for self-exclusions or cooling off – have these standards and rules been presented?
3. Is it possible to play on credit?
4. Paragraph 1-2 – General – designated senior manager – name and position? (1.20)
5. What are your procedures for closing accounts that you perceive are not managed according to your customer rules? E.g. under-age gambling? (2.10) What are the procedures in the event of discovery? (2.11-2.12)
6. How do you check that no customers open more than one account in their name?
7. Is it possible to pay on your site with an account/credit card with a name that is different from the gambling account owner?
8. Describe your responsible gambling efforts regarding staff training in customer service etc. Are they operated internally or by an external party? (2.14)
9. Are there any elements in the gambling tools that are mandatory, such as placing time limits or amount limits or considering time or amount limits?

Questions were also asked of the relevant companies whenever I detected inadequacies in the companies' websites. This was in order to double-check their position on the specific issue.

All the companies that participated in the interviews were also given the opportunity to provide other information of interest to them concerning responsible gambling issues.

All interviews were concluded in week 23.