



Report prepared for

LOTO QUEBEC

**Review of the *Espace Jeux* responsible
gambling strategy (final report)**

Dr Richard Wood

GamRes Limited
Responsible gambling research and consultancy

info@GamRes.org

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Introduction

GamRes was commissioned by *Loto Quebec* to undertake an Independent review of the responsible gambling (RG) strategy and features proposed for the Internet gambling website *Espace Jeux*. This report is designed to highlight the overall strengths and weaknesses of the proposed strategy and to indicate where further improvements have been made following the recommendations from the preliminary report. Drawing upon current evidence in the field of responsible gambling, the reports focused upon the potential of the proposed strategy for helping 'normal' and 'at risk' players to maintain healthy patterns of gambling engagement, as well as direct those with 'problems' to suitable support services.

Beginning with an overview of the issues associated with Internet gambling world-wide, examination is given to the possibility of harms that may be associated with this gambling media. Consideration is then given to the current understanding of the principles of RG, and the possibility for such strategies to mitigate against potential harms caused by excessive gambling. Finally, the specific features of the *Espace Jeux* RG strategy are examined in detail and recommendations are provided for further consideration.

Background

Internet gambling today

According to a recent examination of Internet gambling world-wide (Williams & Wood, 2007) the numbers of people gambling online world-wide is still low compared to those who gamble in more traditional ways, although these figures are increasing. However, it could be argued that this reflects online consumer usage in many other domains (e.g., banking, product purchases, music and video purchases etc.) In the 2000 British Gambling Prevalence Study it was found that 0.5% of the UK adult population had gambled online in the past year (Sproston, Erens, and Orford, 2000). This figure rose to 6% in the 2007 study (Wardle et al, 2007). In Holland it was found that 3.5% of Internet users (age 18 to 55) had gambled online in 2005 which represented a reduction from 5.3% in the previous year (Motivaction International, 2005). In the United States a national study of gambling behaviour found the past year prevalence of Internet gambling in 2000 to be 0.3% (Welte, Barnes, Wieczorek, Tidwell, and Parker, 2002). Whereas, a 2006 survey of the adult population in the United States found rates of 3% (Rasmussen Reports, 2006) and 4% (American Gaming Association, 2006).

In Canada, national past year Internet gambling prevalence between 1999 to 2003 was found to be between 0.2 to 2.0%, with an average of 0.6% (Canadian Partnership for Responsible Gambling, 2004). Most recently, a Canada-wide study conducted between 2006 and 2007 identified past year Internet gambling rates of between 1.5% - 3.1%, with the higher estimate including high risk stocks and day trading, whilst the lower estimate excluded those activities (Wood and Williams, 2007).

However, whilst Internet gambling appears to be becoming more popular it has not necessarily followed that more gambling is taking place overall. For example, the latest

prevalence study in the UK (Wardle et al, 2007) found that despite the increase in Internet gambling, participation in gambling overall remained unchanged. This may indicate a displacement effect whereby some players are switching from traditional gambling to Internet gambling.

In terms of the relationship between problem gambling and the media of the Internet, there has been a lot of speculation for the potential of increased harm. For example, several authors have suggested that issues such as the use of virtual cash, (potentially) increased accessibility to gambling opportunities, gambling in non-gambling venues (e.g., at home) the solitary nature of gambling on the Internet, and the possibility to play whilst intoxicated, may all be risk factors for problem gambling development (Griffiths, 1996; Griffiths, 2001, Griffiths, 2003; Griffiths and Wood, 2000; King, 1999; King and Barak, 1999; Schull, 2005; Shaffer, 1996).

However, it should be noted that the use of virtual cash is not unique to Internet gambling, traditional casinos often use chips instead of money and many traditional forms of gambling can be purchased using credit and debit cards. Furthermore, Internet gambling is not always a solitary activity as there are many examples that involve social interactions (e.g., poker tournaments, multi-player bingo games etc.). Such interactions are social in a different way to traditional gambling games, but they are nevertheless still social. One might also argue that traditional forms of gambling are not inherently social in any case. Sitting at a slot machine in a casino with other players does not automatically mean that those players are socializing with each other in any sense of the word. Furthermore, for some people with with mobility or child-care issues, or those who live in remote areas, Internet gambling can provide a social outlet that they may not otherwise have access to through traditional means.

In terms of the availability of Internet gambling, one might also argue that there are numerous traditional gambling activities currently available in primarily non-gambling venues in most jurisdictions (e.g., bars, depanneurs etc.). Although access to gambling from home is convenient, it may sometimes be the case that other household members (where present) mean that Internet gambling activity is more apparent than a visit to a casino. And, in this respect other family members may be better at identifying intoxicated relatives than casino staff would be. Of course, this would not be true for those who live by themselves.

In summary, it is not to say that these potential risk factors do not exist for Internet gambling, rather the case has not been made that they pose a significantly greater risk for people gambling on the Internet compared to those who gamble in more traditional ways. Nevertheless, in the absence of any conclusive evidence it would be wise to proceed with caution when introducing any new opportunities by which people can gamble.

Another way to examine the potential harm of Internet gambling is to look at jurisdictions where Internet gambling already exists and see if it has in fact contributed towards the increased development of gambling problems within that society. However, this is a rather difficult proposition to examine because although there is some evidence to show that people who gamble on the Internet are more likely to report gambling problems (see for example; Griffiths & Barnes, 2007; Ladd & Petry, 2002; Motivaction International, 2005; Wood, Parke & Griffiths, 2007; Wood & Williams 2007a; Nova Scotia Adult Gambling Prevalence Study, 2007) we can not conclude that Internet gambling was a

contributing factor in the development of the gambling problems identified. For example, people who already have gambling problems may seek to gamble in whatever ways that they can (Wood & Griffiths, 2007). In this context, Internet gambling may just be one of several media, including traditional forms of gambling, that such individuals utilize.

Wood & Williams (2007b) in a survey of 1920 North American Internet gamblers found that those who were identified through the Canadian Problem Gambling Index (CPGI) as having gambling problems were most likely to report that they actually preferred gambling in offline environments. Furthermore, several recent prevalent studies in jurisdictions that offer Internet gambling have shown that overall rates of problem gambling have remained consistent over time despite increased usage of the Internet for gambling overall (Wardle et al, 2007). In Nova Scotia, a province that has offered Internet gambling since 2004 prevalence rates for gambling problems rose marginally between 2003 (2.1%) and 2007 (2.5%), although those identified as 'at risk' for developing gambling problems decreased between the same period (4.8% in 2003 versus 3.6% in 2007) (Nova Scotia Adult Gambling Prevalence Study, 2007). In British Columbia, another province that currently offers Internet gambling, and has done so since 2005, problem gambling prevalence rates remained unchanged between 2002 and 2007 (both 4.6%) despite a 3% increase in Internet participation during this period (The British Columbia Problem Gambling Prevalence Study, 2008).

Therefore, despite the fear that Internet gambling may potentially lead to an increased prevalence of problem gambling, this does not seem to be supported by the actual figures. As such, it may be unlikely that gambling via the Internet is a driver in the development of problematic gambling behavior. In this respect, we should be cognisant of the fact that Internet gambling is not a form of gambling in itself, it is a media for gambling that provides access to gambling activities which (in many cases) have been widely available for much longer in offline environments (e.g., poker, bingo, slot machines, casino games etc.). However, what is important is precisely how these gambling activities are offered and the nature of the games that are offered. For example, it is entirely possible to design two games of the same type (for example slot machine games) one of which will likely be problematic for vulnerable players and the other that will be completely benign. Careful consideration needs to be given to the structural characteristics of the games, during the design stage, to ensure that they are exciting to play without being too exciting to the extent that they facilitate irresponsible play (Griffiths, 1993; Parke & Griffiths, 2007). To this end, an effective responsible gambling strategy should ensure that the available scientific knowledge and expertise are utilized to examine all new games before implementation, and preferably during the design stages.

Internet gambling is ubiquitous in all societies without heavily censored access to the Internet. Therefore deciding between having or not having Internet gambling is not a realistic choice. By recent estimates there are already more than 2500 Internet gambling sites available to gamble on. The only choice is whether or not a jurisdiction offers well regulated and responsibly operated Internet gambling to it's own residents. The alternative is to prohibit locally regulated Internet gambling, leaving residents who wish to gamble online no other option than to play on websites hosted elsewhere with potentially little or no regulatory framework. Previous studies have identified unscrupulous practices amongst a number of Internet gambling websites (Smeaton & Griffiths, 2004; Sevigny, Cloutier & Pelletier, 2005). Unfortunately, there is little that can be done to curb such practices unless they happen to reside in a locally regulated

jurisdiction. Furthermore, it is worth noting that the jurisdiction without well regulated Internet gambling will still have to deal with Internet gambling problems but it will not derive any Internet gambling revenues which could contribute towards treatment programs, education and problem gambling prevention programmes, or research aimed at better understanding how treatment, education and prevention can be improved. Additionally, revenues that could be channelled into other local 'good causes' will also be lost.

Responsible gambling on the Internet

There is wide agreement, that on the whole people who already have gambling problems should not be the primary focus of an RG strategy. Rather, emphasis should be upon encouraging and supporting 'normal' and 'at risk' players to play moderately as one of several entertainment options that they purchase. By contrast, a person who is already experiencing gambling problems is likely to think and behave in irrational ways that can not (usually) be aided through the addition of features that are aimed to help players maintain more effective control. Furthermore, it is not appropriate for a gaming operator to attempt to correct the behaviour of individuals with gambling problems, nor will they have the suitable expertise by which to do so. Nevertheless, a comprehensive RG strategy should still aim to direct people with gambling problems towards appropriate treatments services equipped with the necessary training and resources to assist. This approach to responsible gambling has been outlined in detail in the position paper '*A Science-Based Framework for Responsible Gambling: The Reno Model*' Blaszczynski, Ladouceur & Shaffer (2004) in which it is stated that:

“Responsible gambling refers to policies and practices designed to prevent and reduce potential harms associated with gambling; these policies and practices often incorporate a diverse range of interventions designed to promote consumer protection, community/ consumer awareness and education, and access to efficacious treatment.” (Blaszczynski, Ladouceur & Shaffer, 2004; p308)

Both Bernhard (2007) and Reith (2009) have pointed out that in recent years there has been an overall shift of perspective in relation to theory, research and practice concerning responsible gambling. Whereas, gambling problems use to be seen largely as a medical issue with little control or power attributed to the inflicted. Increasingly, support for individual autonomy has become the important issue. Reith (2009) suggests that this shift in perspective is in part driven by a reframing of gambling from a 'deviant' to a 'normal' leisure pursuit undertaken by a much broader demographic than was traditionally the case.

This shift also reflects wider social and cultural changes that have seen more of an emphasis on the importance of consumers making informed purchase choices on a wide variety of products and services – whether reading nutritional labels for dietary purposes or researching physician qualifications in online databases. As is the case in a number of settings, then, facilitating *informed player choice* has become a major priority in building responsible gaming policy and strategy – an approach that reflects the fact that millions of 'normal' participants willingly play games of chance world-wide every day, and that problem gambling remains an important operational, policy, and health issue in every global jurisdiction.

In a report prepared for the Australian Gambling Council on the principles of informed choice and gambling (Blaszczynski, Ladouceur, Nower & Shaffer, 2005) highlight three basic strategic tenets that they argue should underpin informed choice:

- 1) Individuals are personally responsible for their level of participation in gambling;
- 2) Informed choice is a pivotal requirement for responsible gambling; and
- 3) Science can contribute in determining which information is necessary to promote informed choice in gambling.

The importance of promoting personal responsibility and informed choice, is also reflected in the findings of several studies that have identified player preferences for voluntary responsible gambling tools, as opposed to mandatory restrictions on all players' gambling activities.

On behalf of the e-Commerce Online Gaming Regulation and Assurance organisation (E-COGRA), Parke et al (2007) conducted a world-wide survey of internet gamblers across 96 countries with a sample of over 10,000 respondents. When questioned about various RG initiatives, the majority were in favour of self-set spend limits, self-set time limits, self-exclusion, regular financial statements, and a self assessment test to determine and describe their current gambling behaviour. Follow up focus groups revealed that players preferred 'soft-touch' RG measures that they could manage themselves - rather than mandatory restrictions imposed upon all.

Previous research had suggested that this reluctance to embrace "limits" might actually be broader than we might think -- McDonnell-Phillips (2006) noted that players did not respond well to the term "limit" even when they acknowledged that this was precisely what they tried to do with their own gambling. The term "limit," then, may sound too restrictive and imposing for some players even when they have the option of setting it themselves.

Similarly, in Nova Scotia, Bernhard, Lucas, and Jang's (2006) research on responsible gaming initiatives found strong public support for voluntary responsible gambling tools – and strong opposition to mandatory limits on gambling activity. Other important themes identified in the qualitative portion of this Nova Scotia project revealed that participants focused upon the importance of personal responsibility – with even those experiencing gambling problems insisting that ultimately, the decision to gamble or not to gamble belongs to one person: the individual, and not to any governmental authority or gaming company.

In another study, Griffiths, Wood & Parke (2009) examined player attitudes and perceptions towards a number of RG tools offered to online players from Sweden who played with the state regulated gaming company Svenska Spel. In particular, the study focused on the use of a voluntary player tracking system known as 'PlayScan' and the player tools associated with it. PlayScan is designed to inform players when their gambling behavior changes in such a way that might suggest it is becoming problematic. At the time of the study just over a quarter of Svenska Spel online players (26%) were using PlayScan and just over half of those (52%) said that they found it useful, whereas just under a fifth (19%) reported that they did not find it useful. In relation to the specific RG tools accompanying PlayScan, there was a overall high level of agreement from players that some features were helpful in maintaining healthy playing behavior. For example, most users of the system (70%) reported that the option to set their own spend

limits was useful. Just under half the participants (49%) suggested that it was helpful to review their overall gambling behavior profile. In relation to 'taking action' in response to feedback from PlayScan, fewer participants (46%) noted that self-diagnostic problem gambling tests were helpful, (42%) noted that the voluntary self-exclusion was helpful, and a similar figure (40%) found information and support for gambling issues helpful. However, in relation to 'taking action' it should be noted that there would be some variation in how much action a player would actually need to take. That is, some players' behavior had likely changed very little and therefore they did not find much need for taking additional action in order to manage their gambling behavior.

Focal Research (2007) found that the trial implementation of several responsible gaming features for Video Lottery (VL) games (including player set spend limits) in Nova Scotia reduced the overall levels of expenditure by players in general. Use of these features was associated with longer play for the same or lower levels of expenditure. Whilst this research related to VL games only, it is likely that similar results would be found for Internet based games given the similarity of their basic structural characteristics. However, the specific impact of the player set spend limit could not be separated from the impact of the other responsible gaming features.

A more recent study examined the effects of player set deposit limits on Internet sports betting by customers of *bwin* Interactive Entertainment (Nelson, LaPlante, Peller, Schumann, LaBrie, Shaffer 2008). The study examined 47,000 subscribers to *bwin* over a period of two years of which 1.2% (n=567) set their own deposit limit. However, those players who did set limits tended to be the more active bettors than the rest of the sample across a variety of measures. Overall, the study found that self-set limits helped subscribers to reduce their overall betting activity (i.e., frequency of betting, bets per day, and total money wagered) suggesting that self-set limits may have some utility in helping players to manage their gambling expenditure. However, it should be noted that usage of this RG feature was very low (1.2%). As such, it is important when implementing any RG tool, that is not mandatory, to consider user engagement with the tool and how that might be maximised and encouraged.

What all of these studies show, is that it is of utmost importance that RG tools are perceived as helpful tools by players, if they are to actually benefit from their use. RG tools that are imposed appear to be widely unpopular and as such are likely to have a less positive impact on player behavior. Mandatory measures also take the emphasis away from the individual maintaining control of their own behavior, thereby undermining the guiding principle behind current RG strategies.

Examination of the Espace Jeux Responsible Gambling Strategy and associated features

Internet gambling is technologically driven, and there are arguably more opportunities to control and modify the gambling experience than there are in traditional gambling environments. For example, information on wins and losses can be displayed so that players can easily have access to their past expenditure history, links can be provided to direct those that require help to suitable support services, players can opt to immediately ban themselves from gambling on a particular site if they so wish. Increasingly, the possibility to provide enhanced behavioral feedback to players is becoming a reality. Information gathered on player expenditure and time spent gambling can be fed back to players in order that they can monitor their gambling behavior over time. In this context, the Internet is neither good nor bad by default as a media for gambling. What matters is how online gambling is provided, the types of games that are offered, and the responsible gambling features that are in place. In this respect, an appropriate responsible gambling strategy should be adopted that makes best use of the available evidence, incorporates useful tools to help players manage their gambling behavior, and, is regularly reviewed in order to consider new research findings and remain up-to-date. It is in this light, that the current analysis of the proposed responsible gambling strategy for Espace Jeux has been scrutinized.

Specific responsible gambling features of Espace Jeux

Sign-up procedures – preventing under-aged gambling

It is of utmost importance that the procedures for registering an account for Internet gambling are rigorous enough to categorically determine the identity of the applicant. The procedure must be able to effectively exclude any person under 18-years-of-age. The proposed system of requiring a valid credit-card card number is the current industry standard. Griffiths and Parke (2010) note that this kind of online age verification procedure is often far more rigorous than in traditional gambling venues where often no identification is required to gamble as long as the customer looks old enough. In most cases this type of verification is sufficient as long as the credit-card is issued by a company that requires all card holders to be at least 18 years-of-age. The credit-card used should also be in the name of the primary card holder as all the checks made by the credit-card company will relate to that specific person. However, this method of sign-up will not prevent an under-aged person using a parent's credit-card without their knowledge, although the burden of responsibility in such a case may arguably lie with the parent in terms of safeguarding their credit-cards. In order to be certain that this procedure remains effective it is advised that periodically the sign-up procedure is tested by 'mystery shopper' attempts to register using false information or as a person under the age of 18.

In addition to providing credit-card details, the prospective customer must also provide a valid email address so that they can be notified when their account has been created. The final part of the sign up procedure involves written confirmation of the created

account being sent by post, in a plain envelope, to the address provided by the customer.

It is understood that parental control software that can be used to block child access to Internet gambling is currently being considered. The addition of freely available software to prevent children from accessing *Espace Jeux* would be an excellent feature that should further help to prevent under-aged gambling. The promotion of blocking software to prevent under-aged Internet gambling can also help to reduce the likelihood of children in Quebec gambling on any Internet gambling sites. RG strategy can extend beyond an operator's own products to a wider concern for their customers welfare. For example, if Quebec children access other gambling sites that are not regulated in Quebec the problems that can ensue will still be evident in Quebec, and will ultimately reflect badly on all online gambling operators including *Loto Quebec*.

Payment options

Players can put money into their account using a credit-card, debit card or by using their bank's online bill payment facilities. This choice of payment options would seem largely appropriate and in line with most other practices in the regulated gambling sector. Credit-cards are widely accepted for Internet gambling in virtually every jurisdiction world-wide, with one notable exception being the UK National Lottery where credit-cards can not be used to purchase games. It should be noted that using a credit-card to purchase games online can lead to some players spending money that they do not have. The counter argument, would be that this kind of credit has to be agreed with the credit company, and one might also argue that someone using a debit-card or other means of payment could be spending money borrowed on an overdraft or loan facility. Nevertheless, the apparent ease with which credit-cards can be obtained and used is an issue of concern. Therefore, it is recommended that emphasis is given to the use of debit-cards (where possible) and bank bill payment facilities for account deposits. However, it is understood that both the Caisse Populaire and Banque Nationale, two of Quebec's most popular banks, do not currently issue debit-cards that can be used for Internet purchases (of any kind). For these players using debit-cards is not a an option.

The possibility to withdraw money from the player account and send it back to the player's bank account is an excellent feature. This feature allows the player to remove their winnings or to cancel a deposit that, on reflection, they found was too much. This is an option that is rarely seen on an Internet gambling website and is to be commended.

Player account information

Players will have access to detailed account information, that will show how much they have played, won, their cancellations and refunds, the amounts they have deposited, withdrawn or any manual adjustments that were made. The information can be viewed for the current day, for the past week, the past 2 weeks, the past month, the past 2, 3, 6 and 12 months, or according to a player specified date range.

Such an approach is consistent with providing a high level of informed player choice, one of the corner stones of an effective responsible gambling strategy (Blaszczynski et al, 2005). There is evidence to show that such detailed account information is regarded as

helpful by players for maintaining better control over their gambling expenditure (Bernhard et al, 2006; Focal Research, 2007; Parke et al, 2007). It is rare to see this level of account detail being provided for players on Internet gambling sites, and it is to be commended.

Risk analysis of new games

It is extremely important that any RG strategy has effective procedures for examining the risk potential of any proposed games for adversely affecting vulnerable players. The decision to examine all proposed games using GAM-GaRD will help to ensure that all games are objectively scrutinized in a systematic manner. GAM-GaRD was designed to guide the design of socially responsible games, and represents what is currently known about the characteristics of a game based on current research evidence and clinical experience. The use of this tool will help to ensure that critical features of games, that may potentially be harmful to 'vulnerable' players will be examined, and if necessary modified before any game is launched. Overall, it is important that an Internet gambling website can offer a balanced selection of games, that includes options for players who want a fairly relaxed experience, as well as those who seek the more faster paced variety.

However, problem gambling is a complicated psychological and social issue and whilst such tools can help to minimise harm to vulnerable individuals, they can never prevent everyone from engaging in excessive patterns of gambling behaviour. GAM-GaRD specifically focuses upon the design characteristics of the game itself, and should always be used in conjunction with an overall responsible gaming strategy that considers the broader context in which any particular game is offered. In this respect consultation with RG experts to comment on the suitability of games for Espace Jeux, is also a helpful procedure, as is the case with the current evaluation. This combination should ensure that all games are rigorously evaluated before they are offered to players on Espace Jeux. This type of objective game analysis process is currently undertaken by around 12 regulated lottery corporations world-wide. I am not aware of any unregulated Internet gaming companies that examine the specific risk potential of their new games in this way.

Staff training

It is understood that all staff associated with *Espace Jeux* will receive training in the principles of RG and how the RG strategy is practically implemented. RG should be central to every aspect of *Espace Jeux* operations and it is important that training is updated on a regular basis in order to incorporate new and important research findings in this dynamic field.

Every member of staff that works with gambling products should understand the basic principals of RG. In this way, RG becomes core to the central business of offering games of chance.

Game tutorials

Currently, an online game tutorial will be available for players to learn how to play BlackJack. Tutorials for how to play other games will follow. Providing clear information on how to play a game is helpful for players as it adds to the overall level of *informed player choice*. Tutorials also offer the opportunity to convey responsible gambling messages to players such as the fact that all games involve an element of chance that can not be predicted. In order that the tutorials are easily understood by players, and that the information they provide is in line with the overall responsible gambling strategy of *Espace Jeux* it is recommended that tutorials are examined by an independent RG expert before they are launched.

***Espace Jeux* responsible gambling pages**

Espace Jeux incorporates a suite of tools that are designed to help players to manage the amount of money and time that they spend playing games on the website. Each of the tools is voluntary for players to use. This fits well with the promotion of individual responsibility and reflects the consistent finding that players respond better to voluntary rather than mandatory RG features.

Player tools

Deposit limit

This feature allows players to set a weekly limit for the maximum amount of money that they wish to deposit into their player account. In order to increase the limit the player must wait seven days. If a player wishes to reduce their limit the effect is immediate. Players must set a deposit limit before they can begin playing. This is a commendable approach as it ensures that the player will have to engage with this particular tool, and yet they still maintain autonomy in deciding what is an appropriate limit to set for themselves. By contrast, a fixed mandatory spend limit will always be too little for some players and too much for others.

It is worth noting that there is evidence to suggest that mandatory spend limits, can in some cases cause customers to take their business elsewhere to operators with less restrictive practices. An example of this occurring in a more traditional gambling environment was the Iowa riverboat casinos that opened in 1991. These casinos had player loss limits of \$200 (US) per excursion and a \$5 (US) maximum bet limit. Two of the original five casino boats had closed within one year of opening and moved to Mississippi where less restrictive regulatory conditions prevailed (McMillen, 1996). The same rationale could be applied to overly restrictive features for Internet gambling. Mandatory limits have been shown to be unpopular with players, and if present may drive players to take their business elsewhere.

Time limits

Players will have the option to set a time limit for how long they play for each day, week, or month. Once a time limit has been reached a pop-up screen will appear to remind the player that they have reached their limit, and they will be prevented from gambling any longer in that particular period. Players can only reset this feature after 48 hours has passed since they last set a time-limit. This is a voluntary feature which should have a

great deal of utility in helping players manage their time spent playing, particularly on lengthier games such as poker where time loss can sometimes be more of an issue than loss of money (Wood, Parke & Griffiths 2007). The 48 hour period before a limit can be reset is sufficient to discourage a player from impulsively changing a time limit that they previously set.

In addition to the voluntary player-set time limits it is understood that a pop-up will appear every hour to inform players how long they have been playing the game. Before they can continue, they must press either 'Yes' to play some more or 'No' to immediately quit the game. In addition, the pop-up will inform the player how much they have won and lost during the last one-hour-period. This is an excellent addition that will help to keep players informed about their behavior, as well as their expenditure, and could conceivably help to minimize the chances of players dissociating- that is entering a semi-aware state whereby time passing is barely noticed.

Very few Internet gambling sites currently offer the option for players to monitor how much time they spend playing games. Not only can this help them to better manage how much money they spend, it can also help them to balance playing games with other activities.

Loss limits

This tool gives players the option to stop their playing once their personal loss limit has been reached. Loss limits can be set per day, per week and per month. When a loss limit is reached the player will be shown a warning message and they will no longer be able to play until a new session (as previously defined by themselves) is reached. Alternatively, they can reset the loss limit 48 hours after setting a previous limit. Once again, this should be sufficient to discourage a player from impulsively changing a loss limit that they had previously set.

This is a feature that is rarely seen on Internet gambling websites.

Self-exclusion

A wide range of self exclusion periods are available for those players who wish to prohibit themselves from gambling with *Espace Jeux*. Self-exclusion periods range from one month to a maximum of 5 years. Self-exclusion is initiated through the player visiting the self-exclusion page on the *Espace Jeux* website. Players must agree to self-exclude for one of the exclusion periods and then tick a box to state that they fully understand the process. Exclusion from *Espace Jeux* can also be initiated by contacting *Loto Quebec* directly, if for example a player does not want to go back to the *Espace Jeux* website again. Once the agreement has been made the player can not change the duration of the self-exclusion period. In addition to being prohibited from *Espace Jeux*, players also have the option of excluding themselves from all gambling establishments operated by *Loto Quebec* including casinos and *Salon des Jeux*. However, self-exclusion from other *Loto Quebec* establishments can not be initiated online, the player must contact *Loto Quebec* in person. All communication offering promotions and personalized offers will cease for the period of the self-exclusion.

This would seem to be an effective strategy for self-exclusion. The convenience of being able to initiate the self-exclusion online makes the process both convenient and less intimidating than having to talk to *Loto Quebec* staff on the phone or face-to-face. Research examining online support forums has demonstrated that when initially taking

steps to deal with a gambling problem (or a developing problem) players are less daunted by the anonymity of online communications (Wood & Griffiths, 2007; Wood & Wood, 2009).

Given that it takes around four or five 'clicks' to initiate this feature consideration should be given for including a 'panic button' option that players can use to rapidly exclude themselves for a short period of time (e.g., 48 hours). This can be a helpful tool for players who wish to quickly stop themselves from further gambling at a point before they lose control. Such a feature should require just two clicks. One click on the panic button and another click to confirm the desire to proceed.

Gaming time-outs

Ongoing preliminary research indicates that self-exclusion can also be used by players as another tool for managing their 'normal' playing behavior. A gaming-time out is an example of a tool that a player could use if they want to make sure they do not gamble on certain days or at certain times. It is important that this tool is shown as completely separate to the other self-exclusion feature, in order that players can understand that it is not designed primarily as a tool for dealing with serious problem gambling issues. The proposed design would seem to be a very good example of this feature, it is easy to use and offers a variety of options ranging from a 12 hour break up to a three week break. During this time promotional offers will still be sent but players on a break will not be able to make use of the offer until their designated break is over.

This specific feature is rare to see on an Internet gambling website. For most operators time-outs are only considered to be an option for people who already have a gambling problem. Giving regular players the option of setting times when they can and can't play is an excellent feature that considers that RG is not just about managing spending, it is also about managing time as well.

Responsible gambling information

Tips for playing responsibly

This section contains various useful tips on how to keep play at a healthy level. All of the tips were appropriate and provided helpful suggestions on how to use the player tools to manage everyday play. It would be worth considering changing the name of this section to include a phrase such as "Tips to keep your play fun." The term "Responsible Gambling" by itself may be viewed by some players as only applicable to those with problems.

Espace Jeux will present players with a series of responsible gambling messages to remind them of the fundamentals of responsible play. For example, that gambling is a form of entertainment (not a means to make money). These messages will also help to raise awareness about the responsible gambling tools and promote informed player choice. In addition, some messages will focus upon the negative aspects of gambling by communicating help-line and referral information. Such information is useful for informing players of the various support services that are available, particularly if they are concerned that their gambling behavior may be becoming problematic.

In terms of the efficacy of communicating responsible gambling messages, there is some evidence to suggest that the use of pop-ups can be an effective strategy (Monaghan, 2008). Schellink & Schrans, (2002) found that the use of pop-up messages presented every 60 minutes on modified electronic gaming machines (EGMs) in Nova Scotia resulted in a small reduction in session length and a decrease in expenditure among high-risk players. When messages were presented every 30 minutes they were reported as being seen by more players and resulted in a decrease in the number of times that high-risk players exceeded their budgets set for play. In an experimental simulation study Floyd, Whelan, & Meyers, (2006) found that players who received responsible gambling pop-up messages on an electronic roulette game reported fewer misconceptions about gambling and ended their session with more credits. Similarly, Monaghan & Blaszczynski, (2007) found that students in another experimental study recalled pop-up messages both directly after playing a game and two weeks later when questioned again. In the same study it was also found that messages prompting players to self-reflect on the time and money spent gambling, and the possibility that they should take a break had a significant impact upon their reported thoughts and behavior.

Consequently, whilst the presentation of static responsible gambling information on web pages is useful, the addition of providing dynamic messages may have extra benefits in terms of effectively communicating helpful information to players who may otherwise never see them. However, a careful balance is needed to ensure that such messages are not overly intrusive or annoying to players. It is understood that *Espace Jeux* is planning to use pop-up messages to inform players of every hour that they have been playing. In addition, there will also be streaming messages conveying various RG information. Although there is currently no research that has specifically investigated streaming messages, it is likely that the highly visible and dynamic nature of a streaming message would have a very similar impact as a pop-up message, and should therefore help ensure that these important messages are noticed.

Myth and Reality

Provides some further helpful information for players who may not fully understand the nature of gambling, and can serve as an occasional reminder for all players.

Player profile

This provides a type of interactive self-assessment test whereby players can answer a series of questions about their gambling behavior, to help determine the extent to which it is currently healthy or problematic. The questions that are asked would seem to be appropriate in order to provide helpful feedback to the players. The format of the test is excellent, easy to use with clear guidance about what the results may mean. It would be helpful to have a link to the online support service ParlonsJeux/GamTalk at the end of the test in addition to the 1866 SOS JEUX help-line number. Research shows that a substantial number of players with issues about their gambling behavior are more willing to discuss them first using an online forum than over the telephone (Wood & Griffiths, 2007; Wood & Wood 2009).

Overall, those who make use of the *Player Profile* will experience an enhanced level of informed player choice. They will gain further insight into their current gambling behavior, which should allow them to have a better understanding of whether or not they should continue to play, cut back on how much they play, or seek some support. In addition, the *Player Profile* test allows for any misconceptions about the nature of gambling to be redressed. This particular RG feature is not seen very often on Internet gambling sites and the inclusion of it for *Espace Jeux* players is to be commended.

Mise Sur Toi

Mise Sur Toi will provide a variety of online resources to help players find information and/or referral to a support service. One of the RG advantages that Internet gambling sites have over traditional forms of gambling media is the capacity to easily provide access to this kind of information. As well as providing links to the 1866 SOS JEUX help-line number and other traditional support services, *Espace Jeux* will provide links to online support services available in both French and English.

Online support forums world-wide have been shown to be an effective and popular form of support for people dealing with both online and offline gambling issues, either directly (i.e. themselves) or indirectly (for helping a friend, partner, parent or other relative) (Cooper, 2004; Wood, 2007; Wood & Griffiths, 2007). The services provided by such a forum are not usually considered as treatment, but instead they provide guidance, information, and valuable peer support. Members who use such forums typically include vulnerable players who may have some concerns about their gambling behaviour, people who want answers about how to help others (friends, partners, etc.), those who may have an ongoing gambling problem, or are recovering/recovered from a problem, and people who just want information about what is (and isn't) normal gambling behaviour. In particular, research has shown that for many people using gambling support it was the first time they discussed a gambling issue. The high level of anonymity and availability provided by such services allows people to easily ask questions and get support (Cooper, 2004; Wood & Griffiths, 2007; Wood & Wood, 2009).

Currently, www.GamTalk.org is the only Canadian support service of this kind that is available, and it is mostly an English language service. However, by the time *Espace Jeux* is launched *GamTalk* will be joined by *Parlons Jeux* a French language equivalent thanks to sponsorship from *The Fondation Mise Sur Toi* and *The Canadian Partnership for Responsible Gambling*. Therefore, by providing these services to *Espace Jeux* players who speak either French or English will be supported. The inclusion of a directly linked online discussion forum in French will be the first of its kind in Canada and constitutes a major innovation in player support.

In conclusion

A preliminary examination of the *Espace Jeux* responsible gambling (RG) strategy concluded that overall, it was a well thought out and implemented plan that ranks as one of the most comprehensive of its kind world-wide. In particular, *Espace Jeux* would seem to provide a more responsible online gambling environment than currently exists for Quebec residents, who already play (or may want to play) games of chance on the

Internet. There is a high level of service given to facilitate responsible gambling in players, and to minimize harm to 'vulnerable players.' In particular, utilizing the online facilities of *Mise Sur Toi*, and *Parlons Jeux*, Canada's first French language support forum, constitute an innovation for player support.

Furthermore, it is rare to see game time-outs offered as an option for all players, not just for those experiencing problems, and very few Internet gambling websites currently offer players the chance to set both their own loss limits and time limits. The clarity and variety of the player tools provided, should contribute to a high level of informed player choice for those who choose to make use of them.

Additional recommendations

Overall the proposed responsible gambling strategy for *Espace Jeux* is amongst the most comprehensive and up-to-date of its kind world-wide, for this type of Internet gambling service. The following areas were highlighted for additional consideration. Whilst none of these recommendations are essential in order to offer responsible Internet gambling to Quebec residents, the adoption of at least some of these recommendations will provide additional safeguards, and help to ensure that *Espace Jeux* remains current in relation to emerging RG practices.

- **Player tools** – The proposed tools provide an excellent resource to help keep players informed, and to manage their behavior. However, such tools only work if players are aware of them and choose to use them. One consideration for highlighting the utility of player tools to new customers would be to have a short video demonstrating their use as part of the sign up process. Another alternative would be to require players to initially set both a loss limit and a time limit the first time that they play, again as part of their introduction to *Espace Jeux*. Either of these strategies would help to familiarize players with how to use the tools, and should help to encourage their continued usage. Furthermore, it would help to emphasize that these tools are for everyone to use, not just for people who have problems.
- **Credit-cards** – Whilst the use of credit-cards is standard practice for Internet based gambling, and for some offline gambling activities, use can lead to some players spending money they do not have. Whilst a credit-card is needed for the sign-up procedure when registering to play with *Espace Jeux*, it would be helpful to emphasize the use of debit-cards (where possible) for making account deposits. However, it is recognized that two of Quebec's most widely used banks (Caisse Populaire & Banque Nationale) do not currently provide debit-cards that can be used to make online purchases. For these players, credit-cards may be necessary for depositing funds into their accounts.
- **48 hr panic button** - The addition of a simple two-click process by which a player can self-exclude for 48 hours could help impulsive players stop playing before they lose control. If adopted, the panic button should be easy to find, perhaps at

the bottom of each game page, or at least prominent on the responsible gambling menu page.

- **Multi-game opportunities** – Unlike in the majority of traditional offline gambling settings, Internet players usually have the option to play several different games simultaneously (e.g., Poker and BlackJack). For some vulnerable players who chose to play several games at once, this could be problematic if they lose track of how much they have spent. To some extent, the hourly pop-up that details how much has been won and lost will help players to better understand their overall wins and losses. Nevertheless, consideration should therefore be given to limiting the number of games that can be played simultaneously. This is more important for the faster action games, rather than those that are more prolonged with periods of little player action. However, it should be noted that practically all current Internet gambling websites allow multiple games to be played simultaneously, and there could be nothing to stop *Espace Jeux* customers who want to play multiple games from playing on several Internet sites at once.
- **Player tracking and behavioural feedback** - in order to further facilitate informed player choice, some type of continuous behavioural feedback system might also be considered. Such feedback systems can help players to better understand their gambling behaviour and to consequently make better decisions on when to play again and when to stop or cut down their play. Such a system can also provide an 'early warning' for players whose gambling behaviour has started to change and may potentially become problematic. For the gaming operator, there is an opportunity to offer the player further support in terms of referral and/or to desist from sending further promotional materials to the player whilst they are in a vulnerable state. However, it is important that use of such a feature is voluntary so that players are encouraged to take personal responsibility for their play. In Sweden, there has been some success with this kind of system with most players who use it reporting that they found it a helpful service (Griffiths, Wood & Parke, 2009). When selecting a system for player feedback it is important to consider the utility of the information that will be communicated back to the player (i.e., is it clear for the player to see how their gambling behavior has changed?). The implementation of such a service on *Espace Jeux* will provide another level of informed player choice for those players who choose to use it.
- **Re-name the 'Responsible Gambling page** - For example, including in the title 'Tips to keep it fun' or a similar phrase will help to demonstrate that this information is there for every player, and not just for people who may have problems. Not everyone fully understands the term 'Responsible Gambling.'
- **Develop game tutorials for all games** - and have them checked by an independent RG expert before they are launched. This would also be a good opportunity to convey RG messages about gambling.
- **Provide online support links for the 'Player profile'** - Some players who have concerns about their gambling after taking the test, will be more likely to discuss those concerns online than via a telephone support service.

Recommendations that will be adopted or considered

It is my understanding, that the following additional RG features, as outlined in the preliminary RG strategy review, will be adopted or considered for *Espace Jeux* either prior to launch, or in the foreseeable future. The inclusion of these additional features is to be commended, and (where adopted) should add to the overall effectiveness of the *Espace Jeux* responsible gambling strategy.

- An introductory tutorial will be developed in order to inform players about the RG tools available on *Espace Jeux* and how they work.
- Statements will be provided, to emphasize the use of debit-cards for making account deposits rather than credit-cards, where this is possible.
- The implementation of a ‘panic button’ by which concerned players could quickly (e.g., 2 clicks) exclude themselves from playing for a short period of time (e.g., 48 hours) is also being considered.
- In order to further facilitate *informed player choice*, continuous player tracking and behavioral feedback systems are being investigated. Given that this is a very new and developing innovation, it is likely to take around 18 months for a suitable fully functional, and tested, system to be put in place.
- The name of ‘Responsible Gambling’ section will be modified to also include ‘Tips to keep it fun’ or a similar title that helps clarify that the services provided are for every player to use, and not just for those who may experience problems.
- Game tutorials will be developed for all games, and will be checked by an independent RG expert before they are launched.
- Links to online support services have been added to the player profile test pages, for players who want support but who may feel too embarrassed to call a telephone help-line.

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