Responsible Gaming in the iGaming Environment:
A Tale of Two Cities

by Dave Vialpando

Casino operators, gaming regulators, government officials, and other industry professionals recognized years ago that no one benefits when a problem gambler crosses a casino's threshold. Just the opposite, gaming professionals more than any other group in society, except the family members of problem gamblers and the health care professionals treating addiction, understand the dangerous consequences of problem gambling and are resolute in their commitment to integrate best practices and effective intervention strategies to ensure that the people who patronize these establishments are in control of their actions and derive the desired entertainment and social value from these businesses.

According to the National Council on Problem Gambling, about 1% of American adults may be categorized as pathological gamblers. Characteristics of pathological gamblers include: preoccupation with gambling and with ways to obtain money for gambling, repeated unsuccessful efforts to cut back or stop, gambling to escape from everyday problems, lying about gambling, and jeopardizing personal relationships or employment because of gambling. Another 2%–3% of Americans have significant problems, and as many as 15 million people are at risk.

Enter interactive gaming. Some have suggested that the 24/7 access to gaming and the relative isolation possible in engaging in Internet-based gambling may increase the prevalence of problem gambling. The California Council on Problem Gambling has taken the position that Internet gambling is unlikely to have a profound impact on the overall rate of problem gambling in California, although the Council believes it likely that Internet gambling, without appropriate intervention, will rapidly accelerate the rate of addiction and the severity of losses and consequences for many at-risk and problem gamblers. Because of this, it is essential to commit the resources necessary to minimize the adverse consequences of iGaming, as it pertains to at-risk individuals, and maximize the advantages of iGaming with respect to education, detection, and intervention related to problem gambling. The technological nature of interactive gaming enhances the effectiveness, as compared to land-based casinos, in identifying individuals who may be at risk and in need of the plethora of resources available to assist the problem gambler.

In April 2012, the National Council on Problem Gambling published their Internet Responsible Gambling Standards. In this document, the Council recommends emphasis in the following areas: policy; self-exclusion; staff training; advertising and promotion; informed decision making; game and features; assisting players; and research.

The following is a review of suggestions for the development of a model iGaming responsible gambling program. These suggestions endeavor to combine science-based best practices with the technological capabilities of interactive gaming to fulfill corporate and professional responsibility to the public and to patrons.

Policy - An Affirmative Commitment to Responsible Gambling

At the outset, a commitment must be communicated, throughout an organization, to develop a culture of responsible gambling and rapid and decisive intervention when at-risk individuals are identified. Developing an organizational policy statement to this effect ensures that all employees are on the same page and accept their responsibility to achieving the goals of a responsible gambling program.

A clear and unequivocal public proclamation on an interactive gaming website of a commitment to responsible gambling communicates to potential patrons the importance of healthy and entertaining gambling. This statement might include language similar to the following:

Gamble Responsibly

We are committed to preventing underage gambling and to helping problem gamblers to take control of their situation. We want everyone who gambles at our interactive website to be there for the right reason – to have fun. However, if you believe that your gambling has become a problem, we encourage you to seek help. We have adopted a comprehensive Responsible Gambling Program to help you.

Also remember, gambling should be a form of entertainment – one of many hobbies in which you partake. It is important never to gamble more money than you can afford to lose, or to spend so much time gambling that it begins to interfere with other areas of your life. Here are some guidelines for gambling responsibly, which can dramatically reduce the chances that you develop a gambling problem:

http://problemgambling.securespsites.com/ccpgwebsite/pdf/flyerEnglish.pdf

If you feel like you – or someone you care about – are being harmed by yours or their gambling, know you are not alone. Most people are able to gamble responsibly, but a small percentage of people develop a gambling problem.

Fortunately, these problems are treatable and there are many no-cost resources available to the residents of our state.

Getting help starts with calling the statewide helpline, 1-800-GAMBLER. The helpline is always answered directly by trained professionals, at any time of the day or night – there are no recordings, and your call is completely free and confidential. Translation services are also available for more than 240 languages, and TDY is available for the hearing impaired.

Staff Training and Management's Responsibility

At least one management-level enterprise employee should be designated as the organization's Responsible Gambling Program Coordinator. The responsibilities of this position should include: development of the organization's Responsible Gambling Program incorporating best practices as they are developed throughout the industry; sharing information and effective strategies with other Interactive gaming enterprises; establishing proactive partnerships with community-based organizations and government agencies dedicated to addressing problem gambling issues; responsible gambling database management; review of required reports to gauge the effectiveness of the enterprise's program; and coordination of initial and recurrent employee training in problem gambling detection and referral.

Staff should receive initial training on: the indicators of potential problem gambling; how to respond to individuals contacting customer support seeking information and resources related to problem gambling; resources available to assist at-risk individuals; the enterprises self-exclusion program; and the various enterprise reports recording data related to problem gambling. Upon completion of the initial training, all enterprise staff should receive recurrent training on an annual basis.

Informed Decision Making

Information should be provided on the enterprise's website to assist players in making informed decisions regarding their gambling. Players should be advised of that behavior which may be indicative of at-risk gambling behavior. Published risk indicators might include the following:

- Losing time from work due to gambling?
- Does gambling make you insensitive to the welfare of your family?
- Have you ever felt remorse after gambling?
- Have you ever gambled to solve financial difficulties or sold personal property to finance gambling?
- After winning or losing, do you feel like you must return as soon as possible?

- Do you often gamble until your last dollar is gone?
- Do you ever borrow to finance your gambling?
- Have you ever committed, or considered committing an illegal act to finance gambling?
- Do arguments, disappointments, frustration, even good fortune give you an urge to gamble?
- Have you ever considered self-destruction a result of your gambling?

Consider taking advantage of the interactive nature of the Internet to design a six to eight question self-test a consumer can complete online. Upon completion of the self-test, the computer can assess the results and provide a graphic representing the patron's level of risk. The graphic can be color-coded to add emphasis to the results: red for significant risk, yellow for moderate risk, and green for low risk. Once the patron double-clicks on the colored-coded graphic, he or she can be directed to appropriate information and a list of resources. The interactive system can even be configured so that the significantly at-risk patron is directed to a customer support representative who will evaluate the patron for possible self-exclusion.

A general admonishment to patrons regarding responsible gambling should be made available on the interactive gaming website. This admonishment should be composed similar to the following:

Remember, gambling should be a form of entertainment – one of many hobbies in which you partake. It is important never to gamble more money than you can afford to lose, or to spend so much time gambling that it begins to interfere with other areas of your life. Here are some guidelines for gambling responsibly, which can dramatically reduce the chances that you develop a gambling problem:

http://problemgambling.securespsites.com/ccpgwebsite/pdf/flyerEnglish.pdf

Responsible gambling information should be included in the Terms & Conditions section of the interactive website's registration process.

Examples of patron-assist responsible gambling web-links might include:

- 1-800 GAMBLER
  http://problemgambling.securespsites.com/ccpgwebsite/default.aspx
- The Brief Addiction Science Information Source (BASIS)
  www.basisonline.org

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• National Center for Responsible Gaming
www.ncrg.org

• National Council on Problem Gambling
www.ncpgambling.org

• California Council on Problem Gambling
www.calpg.org

Assisting Players

An advantage of interactive gaming is the ability to monitor and track player activity remotely and unobtrusively. Enterprise personnel should have the ability, based on their training, to flag individuals whose gambling behavior becomes problematic.

Highlights of an Effective Responsible Gaming Program include:

• A choice between a Self-Imposed Limits Program that allows a patron to be self-restricted from the website, or the Self-Exclusion Program which excludes the patron completely from the website.

• Automated tracking of game play at the website and system-generated alerts regarding potential problem behavior issues.

• Trained customer service personnel to assist patrons through the self-exclusion process.

Dedicated enterprise staff should be assigned the responsibility of monitoring patron gambling activity once the automated parameters established by the enterprise indicate at-risk gambling behavior. System-generated alerts coupled with monitored game activity should guide enterprise personnel or customer support staff to contact the patron and discuss self-exclusion options.

Self-Exclusion

Interactive gaming and use of the Internet as a channel for communication facilitates the patron's access to the enterprise's self-exclusion and self-restriction programs. All of the required information can be collected online, and once evaluated and implemented, the imposed restrictions or exclusion can be activated immediately. The automated characteristics of the system completely and unequivocally bars the affected patron from access to the system. Unlike in the land-based casino where excluded patrons occasionally sneak their way back into the casino, the computer never blinks and a patron's access is barred for as long as required.

The interactive gaming systems should provide a link within the patron's interactive gaming account to an Internet self-exclusion application and associated forms. The following provisions should be built into the enterprise's self-exclusion process:

a. Exclusion Length – A patron may request gaming self-exclusion for a period of one year, five years, or lifetime.

b. Communication with Players – For self-excluded patrons, the interactive gaming enterprise shall establish procedures that are designed, to the greatest extent practicable, to ensure that self-excluded patrons do not receive targeted mailings or promotional material related to Internet gaming.

c. Enforcement – For self-excluded patrons, the interactive gaming enterprise shall establish procedures that are designed, to the greatest extent practicable, to:

1. Refuse wagers from and deny any gaming privileges to any self-excluded patron.

2. Deny any financial deposits, player club card membership, complimentary goods and services, and other similar privileges and benefits to any self-excluded patron.

d. Reinstatement – Except for those patrons choosing a lifetime self-exclusion, any self-excluded patron may, upon the expiration of the period of self-exclusion requested, request removal of his or her name from the self-exclusion list by electronically submitting a completed request for removal. The form shall include:

1. Identifying information for the patron.

2. The signature of the patron requesting removal from the self-exclusion list indicating acknowledgement of the following statement: "I certify that the information that I have provided above is true and accurate. I am aware that my signature below constitutes a revocation of my previous request for self-exclusion, and I authorize the interactive gaming enterprise to reinstate my gaming privileges."

3. The type of identification credentials examined containing the signature of the person requesting

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removal from the self-exclusion list, and whether said credentials included a photograph or general physical description of the person.

4. The signature of the interactive gaming enterprise employee authorized to accept such request.

e. Renewal – The one-year and five-year self-exclusion periods should continue indefinitely, unless the self-excluded patron requests, in writing, to be removed after the end of the stated period of self-exclusion.

The gaming enterprise reserves the right to unilaterally exclude any patron for cause. Patron demonstrated gambling activity detrimental to the patron's well-being provides that necessary cause.

The automated construct of interactive gaming allows the enterprise to offer patrons the ability to set their own time and loss limits related to game play. The system can be configured to allow patrons to set daily, weekly, or monthly limits on deposits, wager amount, monetary loss, and amount of time spent gambling on the interactive website.

Advertising and Promotion

The enterprise should take all reasonable steps to ensure that patrons exhibiting at-risk gambling behavior and those who have been excluded for problem gambling do not receive targeted mailings, advertisements, or promotional material related to the Internet gambling enterprise. The restrictions on promotional material should include both Internet and postal advertisements.

Promotional material and advertisements should be constructed so as not to be misleading regarding game outcomes, and should contain an admonishment regarding responsible gambling.

Games and Features

Game information displayed to the patron should be comprehensive, clear, and unambiguous. The interactive nature of Internet gaming allows the player the ability to access substantial information during and after game play. Information that may be displayed to the player include bets, wins, losses, and time logged on to the website. A player-initiated game replay feature allows a patron to review all hands played during a given game, along with all bets made during the game.

The design of the interactive gaming website should be such that the system does not encourage players to increase their bets, chase their losses, or gamble continuously. If a player chat feature is integrated into the system, it should be monitored by enterprise employees to ensure that all conversations are within established standards.

Any free-play games offered through the interactive gambling website should exhibit the same characteristics as real-money games in terms of table rake, percentage pay-outs and odds.

All registered players should be limited to one player account per enterprise website. Patrons should be admonished through the website's terms and conditions that any attempt to circumvent this restriction will result in the patron's denial of access to the gaming website.

An integrated robust age verification system at registration should be incorporated to prevent website access by underage individuals.

Research

The study of behavioral issues related to addiction and problem gambling is an evolving science. Interactive gaming website operators possess the raw data upon which researchers develop and test their hypotheses. As long as the confidentiality of patrons can be maintained, operators should welcome the cooperation of addiction researchers and community-based organizations dedicated to raising awareness related to problem gambling to ensure that Internet gaming products serve as the entertainment outlet they are intended to be and not the source for individual and family crisis.

When it comes to building a robust and effective Responsible Gambling Program, it really is a tale of two cities: the land-based facility with its associated weaknesses in detection, intervention, and exclusion, and the interactive environment, where technology can help monitor, identify, refer, and if need be, forever exclude those who hurt themselves and others through their addictive behavior. ♣

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