



Guideline Development: Mapping the Player Journey to Identify Critical Points for Interaction



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Executive Summary

Delivering the right information - at the right time - is crucial for meaningful communications with players. However, many players only receive communications when they are exhibiting risky behaviours, or at the point in which they are already experiencing harm. It is therefore essential to identify the optimal times for customer interactions to prevent harm from occurring in the first place and promote and maintain a sustainable customer base. The goal of this research was to understand the critical points in a player's journey that can facilitate the right-timing of information sharing to promote safer gambling practices.

The current report presents the results of this research project which focused on:

- Documenting a holistic map of online player journeys
- Identifying critical touchpoints along the player journey and opportunities for impactful messaging and communications
- Reviewing evidence to determine effective approaches for each critical point
- Outlining areas of strength and opportunity in available evidence on player interactions
- Generating actionable recommendations for addressing gaps in current practice






Key Findings

1. Evidence Review

- **Player Journey Map:** The evidence identified a clear non-linear player journey map with touchpoints at onboarding, deposit, in-play, loyalty programs, social interactions, reference materials, withdraw, customer-initiated contact, between sessions, and self-exclusion.
- **Effective Messaging:** The evidence review underscored the importance of evidence-based well-timed and personalized responsible gambling (RG) messaging including between play reminders to set limits. Pop-up messages during gameplay, particularly those tailored to individual behaviours, were found to be effective in reducing gambling-related harm. However, overuse of generic messages can lead to customers ignoring the messages, highlighting the importance of nuanced strategies.
- **Pre-Commitment Tools:** Setting limits *before* gameplay, such as time and expenditure limits, was shown to be effective in promoting RG. These tools help players manage their gambling habits proactively.

2. Focus Groups:

- **Player Insights:** The following are key insights from the Player Focus Group.

	Support for the Player Map - Participants found the player journey map relatable, with many confirming touchpoints with their gambling provider at nearly every stage outlined.
	Key touchpoints for RG communication – Participants identified receiving useful safer gambling information from their gambling provider at sign-up, during play, through reference materials, social interactions with players, and during withdrawals, which supported their decision-making.
	Leverage social media for RG Messaging and reduce stigma – Participants recommended using social media and TV ads to promote safer gambling tools and reduce stigma.
	Streamlining RG information for better engagement at sign-up – Participants found the information useful but overwhelming and prefer it in a more concise, digestible format.
	Customer-initiated contact as a key moment for RG messaging – Players identified customer-initiated contact, such as calls about account restrictions or deposits, as an ideal touchpoint for receiving RG information.

3. Jurisdictional Scan




- **Leading Jurisdictions:** The United Kingdom, Italy, and Ontario (Canada) were identified as leaders in RG practices. These regions have implemented comprehensive frameworks that include stringent onboarding protocols, robust in-play protections, and well-integrated self-exclusion programs.
- **Varied Approaches:** Approaches to RG differ across jurisdictions. The UK and Italy, for instance, favor more centralized and proactive strategies, prioritizing early prevention. In contrast, jurisdictions in the United States and certain



Canadian provinces tend to be less centralized, with some regions adopting a more reactive stance that focuses on intervening only after players have begun to experience harm.

- **Gaps in Practice:** Certain regions may benefit from adopting more rigorous evidence-based in-play protections and more centralized self-exclusion systems. These enhancements would align their practices more closely with those of the leading jurisdictions.

While the commitment to RG is evident across all examined jurisdictions, there is a clear opportunity for improvement in several areas. By incorporating information learned from academic research, jurisdictions can develop informed best practices, enhance player protection, reduce gambling-related harm, and promote a safer environment. This proactive approach will contribute to the global effort to optimize RG measures, ensuring that all players receive the highest standard of care and support throughout their gambling journey.

The following are recommendations that address gaps in current practice.

	<p>Enhance RG messaging during sign-up - RG messaging at the sign-up stage plays a crucial role in shaping RG habits; however, many players feel overwhelmed by the large amount of information provided. Operators should provide more concise, clear, and engaging information at the sign-up stage. It would also be prudent to empirically evaluate the most effective delivery of this messaging.</p>
	<p>Implement personalized and dynamic RG messaging– There is empirical support demonstrating that personalized RG messaging, such as expenditure-specific pop-ups during play, significantly reduces gambling-related harms. Thus, tailored communication is recommended to ensure that messages are more relevant and effective in promoting safer gambling practices.</p>
	<p>Expand RG advertising and social media outreach – Expanding RG messaging beyond gambling platforms to social media and television could help normalize the use of RG tools and reduce stigma. Empirical evaluation is necessary to determine the most effective delivery of this messaging</p>

	<p>Leverage player-initiated contact as key touchpoint – While much attention is given to onboarding and gameplay touchpoints, interactions initiated by players present a significant opportunity for further personalized RG focused engagement and a fruitful line of academic inquiry. Messaging about the random nature of games could be introduced when a customer calls to ask questions about specific games for example.</p>
	<p>Strengthen real-time interventions during gameplay – Real-time interventions such as session reminders and pop-up messages show positive effects in promoting RG. Creative solutions such as visual or audio cues and mandatory breaks should be explored to maximize the impact of real-time RG messages to ensure players remain actively engaged with the RG messages.</p>
	<p>Expand and integrate self-exclusion systems – Full integration and simplification of self-exclusion programs across both online and land-based gambling environments would ensure players receive full support in managing their gambling. Self-exclusion options should be communicated to all players as a beneficial RG tool at all stages of the gambling journey.</p>
	<p>Continuous improvement through player feedback and empirical research – Player feedback should be gathered and evaluated regularly to continuously improve RG tools and communication strategies. The use of player surveys, player data analysis, and focus groups will ensure that RG tools evolve to meet the changing needs of the population, enhancing their effectiveness over time.</p>

Background

The right timing of information sharing is crucial for meaningful communications with players. However, many players only receive communications when they are exhibiting risky behaviours, or at the point in which they are already experiencing harm. It is therefore essential to identify practical times for customer interactions to prevent harm from occurring in the first place and promote and maintain a sustainable customer base.

In 2021-2022, RG+ outlined several behavioural indicators within a session that may suggest a player is experiencing risk, providing opportunities for specific touchpoints for meaningful intervention. However, there are many other critical points along the player journey that may provide opportunities for impactful interactions between sessions (e.g., signing up for a new online gambling account, registering for/moving up a tier in a casino loyalty programme, making a deposit, experiencing a big win or a big loss, customer service interactions, reinstating after a self-exclusion period, etc.), as well as touchpoints for positive reinforcement to promote positive play and safer gambling practices. Identifying these critical points in the player journey for meaningful interaction would allow for more regular, customisable, and effective communications with players in a dynamic way.

In 2023-2024, RG+ leveraged the growing body of research and scoping activities to identify and map out the player journey, as well as assess opportunities for tailored messaging at critical points to prevent harms and promote safer gambling practices. In this piece of work, we considered the following research question: ***What are the critical points in a player's journey that can facilitate the right-timing of information sharing to promote safer gambling practices?*** Attention was focused on identifying the critical points and supporting evidence for the right-timing of information sharing with customers that will have the greatest impact for RG promotion and, in turn, harm prevention. The implications of this work will inform customer interaction guides by identifying meaningful and appropriate points of contact for players online. Specifically, learnings can be used to inform regulatory frameworks for safer gambling practices and provide operators with evidence-based guidelines for assessing and evaluating customer interactions within their existing practices. Moreover, this work will identify gaps in the literature and provide direction for future investigations of effective RG messaging.

To map out critical points along the player journey, that could bolster harm prevention initiatives and the promotion of safer online experiences, RG+:




- Reviewed evidence to construct a holistic map of online player journeys

- Identified critical touchpoints along the player journey and opportunities for impactful messaging and communications
- Reviewed the evidence to determine effective approaches for each critical point identified
- Outlined areas of strength and opportunity in available evidence on player interactions
- Generated actionable recommendations for addressing gaps in current practice

This final report details key findings from the data collection activities, including the mapping of player journey touchpoints, and the recommendations for implementing information sharing to promote safer gambling across the industry.

Methodology

The data collection activities completed were:

	<p>Evidence reviews of peer-reviewed and grey literature to identify critical touchpoints for player interactions and the efficacy of available RG messaging.</p>
	<p>Mapping of current and potential touchpoints for player interactions</p>
	<p>Focus groups with online players to validate player journey maps</p>
	<p>A jurisdictional scan of industry and regulatory policies and laws for RG messaging at each touchpoint in the United Kingdom, Italy, and North American jurisdictions</p>

Evidence Review

A scoping review was conducted using academic research databases (e.g. Google Scholar, PsycINFO) to assess the available academic literature with the aim of identifying critical points

in the player journey that could be touchpoints for RG messaging. The review also sought to gather supporting evidence on the effectiveness of messaging strategies at each of these critical points.

Player Journey Mapping

From the evidence review, a player journey map was developed to identify different times in which players could have interactions with their online gambling provider. These interaction points were informed by the literature review and ten interaction points were identified as critical areas that could be used to promote RG practices that would facilitate harm prevention.

Focus Groups

Focus groups were conducted with those who gambled online to examine player experiences with RG information sharing, and opportunities for additional touchpoints.

Adults 19 years of age or older were recruited to participate in a videoconference focus group. Participants were eligible to participate in the interview if they had been a resident of Ontario for more than three months, and if they gambled twice per month or more. Participants were grouped based on age to ensure there was at least one participant per age group, where possible.

Six focus groups were conducted with 50 participants between April 16th and April 23rd, 2024. The focus groups averaged around 30 minutes each. All participants stayed until the end of each meeting with no reported participants exiting part way through a focus group. Participants were provided with \$50 gift certificates for their time and provided their written or verbal consent before participation.

Discussions focused on validating the player journey map created prior to focus groups and identifying any gaps or areas that could be added to the map.

Jurisdictional Scan

A jurisdictional scan was conducted to examine regulatory requirements for online player interactions within the United Kingdom, Italy (representing southern Europe), and selected North American jurisdictions. The scan was performed through a systematic scan of publicly available information from government and regulatory websites. This approach allowed for the collection and analysis of current regulations governing RG measures across different jurisdictions, providing a comparative overview of the standards and expectations in these regions.

Results

Evidence Review

A review of peer-reviewed and non-reviewed documentation indicated all possible points of engagement along a customer's online player journey. The player journey map (Figure 1) was developed from this review to better understand the sequence and timing of RG messaging as

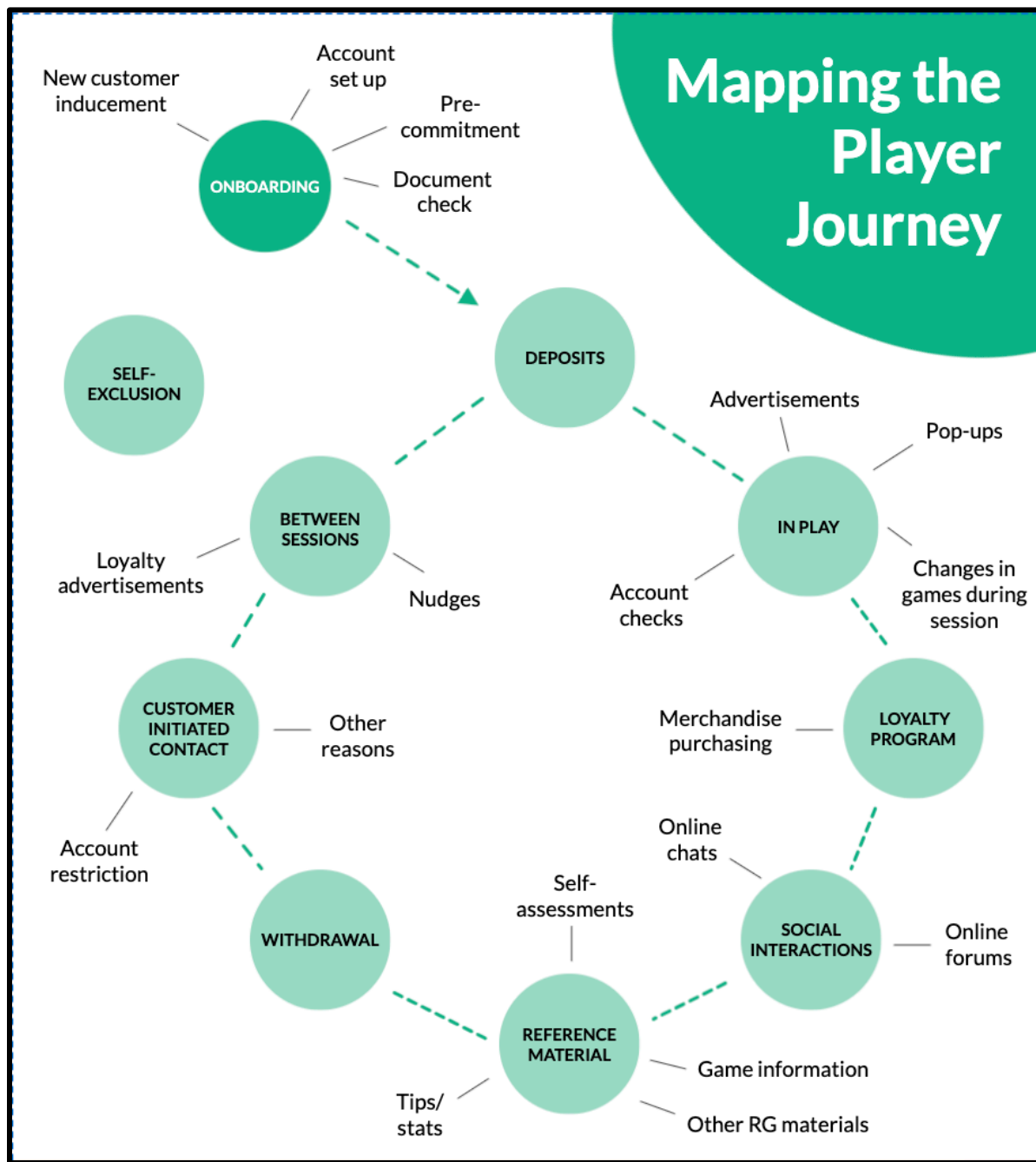


Figure 1. Mapping the Player Journey

players interact with their preferred gambling operators. This player journey map provided a visual representation of how and when players encounter RG interventions. Importantly, this figure identifies a continuous flow of touch points in sustained gambling. The player journey is not linear and limited to interaction touchpoints solely while the player is on the site.

In addition, the peer-reviewed evidence was examined to identify what touchpoints were being used to convey empirically validated RG messaging. This review scope highlighted that the mapping of the player journey was a novel undertaking and that only three of the touchpoints were frequently identified in relation to RG messaging. For the touchpoints being used to convey RG messaging, it was found that messages were being delivered during game play, prior to game play, and between game-play sessions. Most of the evidence found that pop-up messages during game play were a way in which gambling operators were providing RG information (Gainsbury et al., 2015; Kim et al., 2014; Wohl et al., 2012; Wohl et al., 2013; Landon et al., 2015; McGivern et al., 2019; Tabri et al., 2018; Caillon et al., 2021; Hollingshed et al., 2019; Palmer du Preez et al., 2016).

The effectiveness of the delivered RG messages was examined, and it was found that there are two types of in-game pop-up RG messaging that have been explored in the research: informative messaging and personalised messaging. McGivern et al., (2019) used two types of messages in their study, expenditure specific and generic messages. Expenditure specific messages were personalised messages that reminded players how much money they started with at the beginning of their game play, and how much money they have left. Generic messages included statements like “Gambling is a Financially Risky Activity.” Results showed that expenditure specific messaging during game-play reduced expenditure in digital/online roulette therefore, it was recommended that personalised messaging be used during gameplay to reduce gambling-related harms (McGivern et al., 2019). Similarly, Wohl et al., (2013) found that participants who received in-game reminders about expenditure would adhere to their limits put in place. Interestingly, Tabri et al., (2018) found that players who received more pop-up messages during play about their expenditure, were more likely to stop playing than players who just received a message that their limit has been reached.

While pop-up messages have been seen as an effective way to reduce gambling harm (Gainsburg et al., 2015; Palmer du Preez et al., 2016), Caillon et al., (2021) warns that the use of generic pop-up messages may not be as effective or appropriate for online gamblers. Due to an already excessive amount of pop-up messages on the internet, it is possible that internet gamblers may ignore the content of the message and be irritated by even more messages on their screen (Caillon et al., 2021). Likewise, research has found that in some instances, players cannot recall the content of the message after game play (Hollingshed et al., 2019). However, it is also important to evaluate the delivery of more personalized pop-up messaging as it has also

been found that suggesting that a player is within safe limits has contributed to a risky *increase* in play (Wohl et al., 2013). This suggests the need for more tailored, and empirically validated, messages for players to ensure information is being received and is impactful. Finally, Wohl et al. (2017) raised concerns about the content of messages delivered to players. Specifically, they found that providing "green light" feedback, which indicates that a player's gambling behavior is unproblematic, could have unintended negative consequences. This type of feedback may unintentionally encourage players to increase their gambling expenditures, counteracting the goals of RG initiatives. The authors recommend further research to explore the limitations and appropriate use of personalized feedback as an RG tool.

The second touchpoint identified in the empirical evidence review for examinations of RG messaging effectiveness was before game-play sessions. Kim et al. (2014) found that electronic gaming machine (EGM) gamblers who were explicitly asked to set a time limit on their machines prior to play were more likely to do so and spend less time gambling than those who were not given such instruction. This suggests that RG messaging prior to play can be an effective way to implement safeguards. Additionally, Christensen et al. (2024) found important effects between preset spending limits and time limits in reducing gambling expenditure. Specifically, gamblers who consistently set both spending and time limits before play showed significantly lower expenditure compared to those who only set one type of limit. This further highlights the importance of encouraging players to set multiple limits as a strategy for maximizing harm reduction (Christensen et al., 2024).

The other touchpoint that had RG messaging effectiveness evaluated was the between game-play sessions touchpoint. Herine & Gainsbury (2021) investigated the effectiveness of limit setting messages between game-play sessions. Messages were sent to either a player's online gambling account or their email address. While there was not a difference in effectiveness between messages sent to a player's account or email address, it was found that those who received messages were more likely to set limits than those who did not receive messages about limit setting.

Key Findings

- The players journey map identified multiple touchpoints that could be used to deliver RG messages
- The literature highlighted that effective pop-up messaging includes non-repetitive personalized messaging during and between play
- Messaging before play, and between sessions, that reminds customers to set limits has some empirical support
- Setting time and money limits at the same time was significantly more effective than either of these RG measures use alone

- The impact of delivery and content of RG messaging does require evaluation as unintended consequences have been found including message desensitization and even increases in play

Player Focus Groups

In this section, we review the findings from a set of focus group discussions with players. The aim of the focus groups was to validate the player journey map created, as well as identify any gaps in the map and learn about when players have received RG messaging, and the effect that messaging had on players.

50 participants were interviewed in six online focus groups. All participants were Ontario residents over the age of 19, who had lived in the province for three months or more and who gambled twice or more per month. Given the non-random nature of recruitment and the relatively small sample size, results cannot be projected onto the larger population.

Validating the Player Map

The player journey map was presented to participants at the beginning of each focus group (Figure 1). After reviewing the map, players were asked how well the map resonated with them. Players were also asked to share which touchpoints they have or have not received safer gambling information from their gambling provider. All participants mentioned that the player journey map resonated with them. Many participants reported having touchpoints with their gambling provider at nearly all points. Most participants reported having contact with their gambling provider at the sign up, deposit, account registration, and during withdrawals.



“This map really resonates with my experience with online gaming. I have had contact with my provider at all touchpoints outlined.”

Participants were also asked to highlight any gaps in the map and identify whether touchpoints where they have had contact with their gambling provider that was not shown on the map. Majority of participants did not have any points to add to the map and for the most part felt that it was an accurate representation of their gambling journey. However, a few participants mentioned they had contact with their gambling provider after receiving their player statements about their monthly spending.

Efficacy of Messaging

While many players reported receiving RG information from their gambling provider at various points of their journey, it is important to investigate the efficacy of the messages being shared. Many participants mentioned that most of the information they receive from their gambling provider is useful. For example, one participant mentioned that the RG messaging during play is especially useful and helps them to not overspend. Another participant mentioned that the

reference material about different games is very useful to ensure they understand new games that they are interested in playing and understand the different odds of games. Lastly, another participant mentioned that the RG information that they received during the self-exclusion process positively helped them to understand the harm they were experiencing from excessive play.

While most participants mentioned that the information they receive from their gambling provider is useful, there were many participants that mentioned the information was not as useful during certain touchpoints. For example, during account sign-up players mentioned the amount of information presented can be overwhelming. While some participants mentioned they read through all the RG information, many participants mentioned that they simply click through all information so they can start their play. It is important to present this information in a more appealing and appropriate way in which players will effectively interact with the RG information in a positive way.

Beneficial Touchpoints for RG Information

There are many touchpoints in which gambling providers have contact with their players and provide RG messaging. It is important to get the player perspective to ensure messaging is beneficial and well received. Focus group participants were asked to share their thoughts on the most beneficial touchpoints to receive RG information from their gambling provider. Many participants discussed that they would like to see more RG information through advertising on social media and on other media outlets (e.g., television). Focus group participants believed that seeing more information about available tools would help to decrease the stigma around RG tool usage. Many players in the focus group mentioned that they thought RG tools only should be used if someone is experiencing gambling harms. There is an opportunity for gambling providers to bring more awareness to available RG tools to reduce the stigma.

Participants mentioned the onboarding and sign-up stage is a critical touchpoint to receive RG information. While there is a lot of information being shared already at that stage by all gambling providers, players reported that the volume of information can be overwhelming and sometimes instead of reading through it, they skip through to start play. While sign-up is an important time for RG messaging, it is recommended that gambling providers present the information in a more digestible format that is easier for players to comprehend. Another touchpoint that many players mentioned to be a critical touchpoint to receive RG information would be during player-initiated contact. For example, some players recalled calling in to the gambling provider to discuss specific account issues such as locked accounts, time between deposit and play, and



“I see a lot of RG information during the sign-up period however, it is a lot of information to read through and I usually skip through the information.”

how long it takes to withdrawal money. Players did not recall receiving RG information at this touch point but did mention numerous times that it could be beneficial to hear.

Most focus group participants mentioned that players should be receiving RG information at all touchpoints. One player mentioned that there should be a unique way of enlightening players about RG features and information. Similarly, another player mentioned that RG messaging and information cannot be overemphasized, especially in terms of financial risk. Players mentioned that different types of RG information would be beneficial to reduce repetitive messages. It is important for gambling providers to get player feedback on the different messages at each touchpoint to ensure messages are beneficial, and useful to players.

“

“It would be nice to see information shared at all touchpoints but in a unique way to enlighten me about responsible gambling features and information.”

Key Findings

1. Nearly all participants mentioned that the player journey map **resonated** with them. Many participants reported having touchpoints with their gambling provider at nearly **all points** outlined on the map.
2. Participants have received safer gambling information from their gambling provider at **various touchpoints** such as **sign-up, during play, reference materials, social interaction** with other players, and during **withdrawals**. Participants mentioned that the RG information that they received at each touchpoint was useful and helpful in their decision making.
3. While participants mentioned that the information at sign-up is useful, due to the volume of information it is **difficult to read** through the entirety of the RG information. Players would like to see this information presented in a more digestible format.
4. An additional touchpoint in which players stated would be a good time to receive safer gambling information was through **advertisements** on social media and television. Participants mentioned that they would like to see information about available tools (e.g., limit setting, etc.) in these advertisements to decrease stigma around using these tools.
5. Another touchpoint in which players stated would be a good time to receive safer gambling information was during **customer-initiated contact**. For example, when players call in to contact their gambling provider about things like account restrictions and deposits, players felt that this was a time that they should be receiving RG information.

The findings indicate that the player journey map strongly resonates with participants, who have experienced touchpoints with their gambling providers at nearly every stage outlined.

Participants consistently acknowledged the value of receiving RG information across various touchpoints, such as sign-up, during play, and through social interactions, noting its positive impact on their decision-making processes. However, despite the usefulness of RG information at sign-up, the volume presented can be overwhelming, suggesting a need for more digestible formats. Additionally, participants identified advertising on social media and television, as well as customer-initiated contact, as potential opportunities for delivering RG information. Incorporating RG messaging into these additional touchpoints could further enhance player engagement and reduce the stigma associated with using RG tools. These insights highlight the importance of strategic timing and tailoring RG communication to effectively support players throughout their gambling journey.

Jurisdictional Scan

This jurisdictional scan was conducted to provide a broad understanding of the regulatory frameworks governing online gambling across various regions. The primary aim of this review was to determine whether the jurisdictions in our project scope had implemented policies to ensure RG messaging and safeguards were consistently applied. Specifically, this review sought to identify potential gaps in policy, including the absence of measures to incorporate empirically validated RG messaging at critical points of interaction. By examining these policies, the review aimed to assess the extent to which regulations endorse RG, promote safer engagement and protect at-risk populations.

The jurisdictions included in this analysis span a wide range of geographic regions, each with unique regulatory approaches. These regions include Canada, the United States, the United Kingdom, and Italy. Each jurisdiction was selected to provide a representative cross-section of global regulatory practices, allowing for the identification of both common trends and regional differences in RG regulation.

The scan involved the collection of regulation data specific to minimum age requirements, account limitations, identity verification processes, deposit limits, self-exclusion mechanisms, and RG prompts. These data points were crucial for understanding the touchpoints at which players interact with RG measures, particularly during the onboarding and account setup processes. Additionally, we examined the technical enforcement of geolocation requirements, residency restrictions, and educational tools made available to players. These factors collectively inform the regulatory environment governing online gambling and illustrate how different regions address player safety and financial responsibility.

The key touchpoints addressed in this review include the initial onboarding phase, where identity and age verification occur; the establishment of financial limits at account creation; and

pre-commitment features such as deposit, wager, and play-time caps. These touchpoints are critical in embedding RG messaging and practices from the outset, thereby reducing the risk of harmful gambling behaviours and ensuring that players engage with gambling in a safe and controlled manner. Through this jurisdictional scan, we aim to highlight both the strengths and potential gaps in these regulatory frameworks, offering insights into how various regions have approached consumer protection.

Onboarding

Account Set Up

The regulatory frameworks governing online gambling in various jurisdictions demonstrate both similarities and differences in their approaches to player protection, account management, and RG. Jurisdictions worldwide consistently enforce minimum age requirements and account limitations for gambling participation, with specific rules designed to uphold RG practices and prevent fraudulent behaviour.

1. **Minimum Age Requirements:** Across various jurisdictions, there is a consistent requirement that individuals must meet a minimum age to participate in gambling activities. For example, the UK mandates that gaming machines cannot be used by individuals under the age of 18, while in the United States, the age requirement varies slightly but generally requires individuals to be at least 21 years old to engage in gambling activities, as seen in West Virginia, Delaware, and Pennsylvania.

In Canada, the minimum age for gambling varies slightly by province but is generally set at 18 or 19 years. For instance, Manitoba, and Alberta set the minimum age at 18, while provinces like PEI, and New Brunswick require individuals to be at least 19 years old. In Ontario, Saskatchewan, and British Columbia, players must be 18 years of age to participate in lottery, charitable gaming and in-store sports betting, but they must be 19 years of age or older to visit casinos and slot facilities, as well as to participate in online casino gaming and online sports betting.

2. **Account Limitations:**

Many gambling jurisdictions impose restrictions on the number of accounts a player can hold with a single operator, a measure designed to prevent fraud, ensure RG, and maintain oversight. For example, Italy allows only one account per concessionaire, while U.S. states like Connecticut and Michigan, as well as Canadian provinces such as Ontario, British Columbia, and Alberta, enforce similar rules. Some regions, like Italy, also require operators to maintain detailed records of player identity, balances, and gameplay, though this is not universally mandated.

Further reinforcing these restrictions, jurisdictions like Pennsylvania and Prince Edward Island explicitly prohibit players from using multiple accounts, either jointly with corporations or to bypass rules. This prohibition helps prevent fraud, underage gambling, and circumvention of RG limits, ensuring a more secure environment.

Documentation Check

Identity verification processes are an essential regulatory measure across gambling jurisdictions, ensuring compliance with age restrictions and safeguarding vulnerable individuals from exploitation.

1. **Age Verification:** Identity verification processes are universally required to ensure compliance with age restrictions. For example, in Italy, the player's age, identity, and tax code must be validated before allowing them to play games. Canadian jurisdictions like British Columbia and Ontario require that players provide legal proof of age during registration, ensuring that all participants meet the jurisdiction's legal gambling age.
2. **Identity Verification and Account Holder Matching:** Pennsylvania and Manitoba are examples of jurisdictions that require that the account holder's identity is matched during deposit processes, a measure aimed at preventing fraud and ensuring RG.

Pre-Commitment

Jurisdictions increasingly require players to establish gambling limits during the registration process, ensuring that responsible gaming practices are embedded from the outset while providing flexibility for players to manage their own gambling behaviours.

1. **Setting Limits at Registration:** Several jurisdictions mandate that players set limits during the registration process. In Canada, for example, Manitoba requires players to establish account balance deposit limits and gambling time limits at the time of registration, subject to specific weekly maximums.

In the Atlantic provinces of New Brunswick and Nova Scotia, as well as Ontario and British Columbia players are provided with the ability to set weekly deposit, daily spend, and daily time limits. Players can decrease their limits at any time for any reason; however, a requested increase will only take effect after 24 hours.

2. **Specific Requirements for Tournaments and Games:** New Jersey requires tournaments to provide detailed information such as game type, rules of play, entry fees, funding sources, and prize structures.

Location

Geolocation enforcement and residency requirements are critical components of regulatory frameworks in numerous jurisdictions, ensuring that gambling activities are confined to legally permitted areas and residents while employing technical measures to maintain compliance.

1. **Geolocation Enforcement:** Across the jurisdictions reviewed, there is a consistent emphasis on ensuring that gambling activities are restricted to individuals physically present within the respective regions where such activities are legally permitted.

This is evident in regulations from the United States, such as in West Virginia, Delaware, Pennsylvania, and New Jersey, which all require that players be physically located within the state at the time of wagering or gaming. In both Italy and Canada, similar geolocation requirements exist, with provinces like Manitoba, Ontario, and Quebec mandating that players be physically present within the province to engage in gambling activities. Alberta's regulations further emphasize this by prohibiting the purchase of games on PlayAlberta.ca from outside the province. The UK includes a provision whereby it is illegal to invite or enable someone in a prohibited territory to participate in remote gambling.

Residency Requirements: Several jurisdictions also impose residency requirements in addition to geolocation checks. For instance, players in Manitoba must be residents of the province and physically located there when engaging in gambling activities. Similarly, in the Atlantic Canadian provinces (PEI, New Brunswick, and Nova Scotia), residency within Atlantic Canada is required for registration and participation in gaming activities.

2. **Technical Measures for Compliance:** Jurisdictions like Italy and the United States employ technical measures to enforce geolocation compliance. In Italy, operators are required to use systems capable of geolocating IP addresses and denying access to players outside the defined jurisdiction. In Canada, Ontario uses location services to track IP addresses which ensures that players are physically located in the province during gameplay. Similarly, in the U.S., states like Nevada and Pennsylvania require operators to track the physical location of players and ensure they are within state boundaries during gameplay. Nevada takes this further by requiring operators to maintain a record of the player's physical location throughout their session.

Conclusion:

- The regulatory approaches governing online gambling highlight both convergence and divergence in key areas of player protection, account management, and responsible gambling. Jurisdictions universally emphasize age verification, account limitations, and geolocation enforcement as foundational safeguards. The incorporation of identity verification and pre-commitment measures reflects a broader trend toward embedding responsible gambling practices from the outset of the player experience. While specific requirements, such as those for tournaments and geolocation, vary in their technical rigor and application, the overarching objective remains consistent: to create a controlled and transparent gambling environment that balances player autonomy with regulatory oversight.

Deposits

Pre-Set Limits

The regulatory frameworks for deposit limits and RG measures across various jurisdictions, including the UK, Italy, the United States, and Canada, exhibit both similarities and differences. These differences are primarily rooted in the operational specifics and the level of autonomy given to players in setting these limits.

1. **Limit Setting Autonomy:** A commonality across all jurisdictions is the emphasis on RG, with most offering players the ability to set deposit and time-based limits. However, there are significant differences in how these measures are required to be implemented.

The UK requires a 24h cooling off period before limit increases are implemented. Canadian provinces often require a cooling-off period when players request a limit increase (all decreases are implemented automatically) or enforce specific weekly limits. Some provinces also have maximum limits; for example, Quebec has a maximum weekly limit of \$9,999CAD.

Jurisdictions in the United States tend to focus more on providing resources or allowing player-set limits rather than enforcing predefined constraints. Additionally, the level of autonomy granted to players in managing their gambling activities varies significantly, reflecting differing regulatory philosophies and levels of state intervention. West Virginia, New Jersey, and Pennsylvania require that any increase to limits become effective only after expiration of the time period for the previous limit.

Italy's regulations are detailed in their approach to self-limitation mechanisms, requiring specific limits on deposits, bets, and time periods, which take effect upon a player's next login.

2. **Educational Tools and Limits:** Certain Canadian provinces like PEI, New Brunswick, and Nova Scotia take an educational approach by connecting players with instructional videos to watch before setting weekly deposit limits. These videos explain how the tools work and their purpose in helping players manage their gaming budget.
3. **Identity Verification:** an emerging regulatory trend is the prohibition of automated play. For example, New Jersey prohibits the use of automated bots or software for engaging in gambling.

Conclusion:

The examination of regulatory frameworks for deposit limits and responsible gambling measures reveals a shared focus on promoting player responsibility, while variations in implementation reflect different regulatory priorities. Most jurisdictions provide players with autonomy to set deposit limits, though the extent of this flexibility varies, with some regions enforcing cooling-off periods or predefined constraints to prevent impulsive gambling. Educational initiatives, such as the use of instructional tools, further distinguish certain frameworks by actively engaging players in understanding the significance of these limits. Additionally, the prohibition of automated gambling tools in some regions illustrates a commitment to maintaining the integrity of player behaviour, underscoring the importance of both responsible gambling and regulatory oversight in shaping safe gambling environments.

In-Play

Advertisements

Several international jurisdictions have implemented stringent regulations on gambling advertising to enhance consumer protection, promote RG practices, and reduce misleading or harmful marketing strategies.

1. **Emphasis on RG and Protections for High-Risk Players:** Italy currently maintains a blanket ban on gambling advertisements. In the UK, regulations related to online gambling advertisements impose strict guidelines to prevent the portrayal, condoning, or encouragement of gambling behaviours that are socially irresponsible or that may lead to financial, social, or emotional harm. Advertisements must not exploit the vulnerabilities,

aspirations, or inexperience of children, young persons, or other vulnerable individuals, nor suggest that gambling is a solution to financial difficulties. Furthermore, gambling ads are prohibited from linking the activity to sexual success, seduction, or attractiveness, and must not strongly appeal to youth culture. Individuals under the age of 25, or those who appear to be, are also barred from playing a significant role in such advertisements.

In Canada, several provinces emphasize the protection of minors in their online gambling advertisement regulations. Ontario, British Columbia, Saskatchewan, Quebec, and Atlantic Canada (ALC) all prohibit advertising that targets underage individuals or uses themes, imagery, or language appealing to minors, such as cartoon figures or celebrities. Additionally, Ontario, British Columbia, and Quebec specifically prohibit marketing near youth-oriented locations or in youth-focused media, while Saskatchewan allows exceptions only when promoting abstinence or moderation in gambling.

RG and social responsibility are fundamental components of online gambling regulations across several Canadian provinces. In Ontario, British Columbia, Quebec, and Atlantic Canada (ALC), advertisements are prohibited from encouraging irresponsible gambling, promoting excessive play, or exploiting the vulnerabilities of high-risk individuals. Additionally, these provinces mandate that gambling promotions must not suggest gambling as a solution to financial or social difficulties. In Quebec and Atlantic Canada, regulations further require that advertisements uphold public trust by presenting gambling in a responsible manner and avoiding depictions of gambling as a financial investment.

Ontario imposes additional restrictions on the use of marketing inducements, bonuses, and credits. These are permitted only on operators' websites or through direct advertising based on consumer consent, ensuring that gambling promotions are responsibly targeted.

In less regulated provinces like Alberta and Manitoba, the focus remains on ensuring the legality of gambling operations rather than detailed advertising guidelines. In Alberta, regulations are primarily concerned with the legality of the operator, while in Manitoba, advertising is permitted for licensed charitable events with few additional restrictions.

In the United States, many states have implemented regulations to prohibit online gambling advertisements from targeting minors or self-excluded individuals. New Jersey, Connecticut, Michigan, and Pennsylvania require that ads must not target minors, with Connecticut setting the minimum age at 21 (or 18 for keno, online lottery, and fantasy contests). Delaware and Nevada permit gambling advertisements only if the company is registered in the state, while sports betting ads are allowed only in New Jersey and Nevada for

individuals 21 years or older. Connecticut further prohibits ads from appearing in media primarily targeting minors and requires that direct advertisements include an easy opt-out mechanism. Michigan also prohibits targeting self-excluded individuals but imposes no specific restrictions on advertising methods, provided self-exclusion policies are respected.

Furthermore, New Jersey, Connecticut, and Pennsylvania mandate that advertisements must not encourage excessive or irresponsible behaviours. Connecticut and Rhode Island require that problem gambling helplines be prominently displayed in all promotional materials, and most states, including New Jersey and Connecticut, require landing pages to include RG messages and access to support services. Pennsylvania also imposes additional restrictions, prohibiting indecent or offensive information in ads and regulating the use of celebrity endorsements to ensure transparency and fairness.

Additionally, many states, including Delaware, Nevada, and Michigan, require that operators clearly state that gambling opportunities are only available to individuals located in states where such activities are legal. This ensures transparency and reinforces RG practices in all promotional materials.

- 2. Regulations Against Deceptive Advertising:** In the UK, regulations related to online gambling advertisements impose strict guidelines to prevent the portrayal, condoning, or encouragement of gambling behaviours that may lead to financial, social, or emotional harm. Advertisements must not suggest that gambling is a solution to financial difficulties or link the activity to sexual success, seduction, or attractiveness.

In Canada, Ontario, British Columbia, Quebec, and Atlantic Canada (ALC) mandate that gambling promotions must not suggest that gambling can resolve financial or social difficulties or depict gambling as a financial investment. These measures are intended to prevent misleading or deceptive messaging in gambling ads.

In the United States, New Jersey, Connecticut, and Pennsylvania prohibit advertisements from implying that gambling guarantees financial, social, or personal success. Pennsylvania also has specific restrictions against indecent, offensive, or misleading information in advertisements.

- 3. Penalties and Enforcement:** Fines for breaches in advertising regulations are universal across the various jurisdictions. As an example, in the U.S., New Jersey has stringent penalties, with fines of up to \$10,000 per violation for advertising that breaches commercial enterprise provisions.

Pop-ups

The comparison of RG regulations across these jurisdictions reveals a spectrum of approaches. While the core objectives of protecting consumers and promoting RG are universally shared, the methods of achieving these goals differ markedly, reflecting each region's legal context, cultural attitudes, and policy priorities.

- 1. Entry and Login Requirements:** Most jurisdictions require a message when logging in and beginning play. For example, in Italy, there is a focus on responsible gaming and the protection of minors right from the entry window, which must contain a warning and a link to a webpage dedicated to responsible gaming. While in the United States, states like Nevada require players to acknowledge that persons under 21 are prohibited from gambling before they can log in.
- 2. Responsible Gaming Prompts:** Many jurisdictions mandate clear warnings and reminders about responsible gaming. For instance, both Italy and the United Kingdom emphasize the need for warnings regarding the dangers of gambling. Italy requires a visible warning on entry screens about the potential harm of gambling, particularly emphasizing the protection of minors. Similarly, the UK mandates provisions to discourage repetitive play, indicating a shared concern for mitigating problem gambling.
- 3. Pop-Up Notifications:** Jurisdictions in the United States, such as New Jersey and Connecticut, along with Canadian provinces like British Columbia and Prince Edward Island (PEI), require periodic pop-up notifications during gaming sessions. The nature and frequency of intervention mechanisms vary. New Jersey has a system that includes a pop-up every 30 minutes to show the current time and session duration, with additional steps required when lifetime deposits exceed \$2,500. British Columbia focuses on promoting breaks in play through hourly pop-up messages and notifications when weekly deposit limits are reached but allows players to opt to continue playing after re-establishing limits. These notifications serve to inform players about the time spent gambling, promoting breaks and encouraging responsible behaviour. This reflects a common approach to integrating real-time interventions within gaming platforms.
- 4. Player Information and Limits:** There are several jurisdictions which enforce regulations that require players to be informed about their gaming activity. For example, in the United States, Pennsylvania mandates that upon login, players must have access to information on their current funds, wins, and losses, as well as the rules of the games they are playing. Similarly, PEI and New Brunswick in Canada require on-screen reminders of weekly deposit limits and notifications before mandatory breaks, ensuring that players remain aware of their gaming behaviour and financial commitments.

Account Checks

Many jurisdictions emphasize account transparency by requiring operators to provide players with continuous access to their account information, transaction history, and RG resources. Regulatory frameworks often mandate that all transactions be logged and tracked through audit systems to ensure accountability and easy access to data. Additionally, RG measures are integrated into account management systems, with some regions requiring the monitoring of player risk profiles and the provision of tailored resources. These efforts aim to promote safer gambling environments by combining transparency with RG tools such as limit-setting features and detailed account statements.

- 1. Account Transparency and Accessibility:** Many jurisdictions emphasize the importance of providing players with easy access to their account information and transaction history. Italy mandates that all deposits, withdrawals, and balance updates must be logged and provide accessible links to RG resources. Canadian provinces like British Columbia, Ontario, PEI, New Brunswick, and Nova Scotia require that players have 24/7 access to their gambling information, including session times and account history. In the United States, New Jersey and Connecticut also require the availability of detailed account statements, with Connecticut further mandating the inclusion of both detailed and summary statements.

Italy has a distinct requirement that all account-related transactions be logged in an audit system and that all account windows provide easy access to player protection resources.

- 2. RG Monitoring:** Several jurisdictions integrate RG mechanisms into their account management systems. While Canadian provinces like Ontario require specific mechanisms for monitoring player risk, where at minimum operators are required to include a risk profile for players at high-risk of experiencing gambling related harms. Other provinces like Alberta have a more general approach, with an annual requirement for casinos to provide win/loss statements to patrons involved in player reward programs. In Atlantic Canada, Prince Edward Island (PEI), New Brunswick, and Nova Scotia under the Atlantic Lottery Corporation (ALC) framework may (but is not required to) provide information tailored to players' risk ratings and RG behaviours. This can include: (i) offering resources to promote healthy gambling habits and support services, (ii) adjusting marketing or promotional activities, (iii) tailoring communications with players for harm prevention purposes, (iv) modifying product offerings, and (v) making other adjustments as necessary.

In the United States, Connecticut mandates regular reviews of internet gaming accounts, particularly for amounts of \$500 or less. They also require the inclusion of RG limit-setting information in account summaries (specifically deposit, withdrawal, win or loss monetary

amounts, and self-imposed RG limits), aiming to help players manage their gambling activities. Pennsylvania has a provision for a pop-up section upon login which links the player to account information as well as information on how to contact services for problem gambling.

Changes in Games During Session

Jurisdictions worldwide adopt a variety of regulations regarding wagering limits, game rules, and RG measures, aimed at promoting transparency, fairness, and player protection within gaming sessions.

1. **Wagering Limits and Game Rules:** A consistent theme across multiple jurisdictions is the requirement for clear communication of wagering limits. In the United States, states such as West Virginia and New Jersey mandate that interactive gaming platforms must prominently display the minimum and maximum wager limits for games. In New Jersey, it is also required that before gameplay begins, game rules, payouts, approved variations, and other relevant information must be displayed. Similarly, Nevada requires that all fees and monetary wagering limits are clearly explained to players and prohibits any player from occupying more than one position at a game simultaneously.

In Canada, Saskatchewan's regulations also require that betting limits are clearly posted at each game, ensuring that no player exceeds these limits. Alberta imposes specific limitations such as restricting buy-ins to below \$10,000 and seeding jackpots to a maximum of \$10,000 per jackpot.

Italy's regulations align with the general European regulatory framework, which includes the requirement for transparent communication of wagering rules and limits.

2. **Tracking Wins and Losses:** A key similarity across these jurisdictions is the requirement for gambling operators to provide players with detailed information about their gambling activities upon request. For instance, in Italy, players can request a transaction report that includes a breakdown of winnings, losses, and timestamps for each play, along with a summary of these details for the requested period.

In the US, Nevada requires the establishment of loss limits that can be enforced within a specified time, but it does not mandate the same detailed account statements as New Jersey or Connecticut. In New Jersey, the operator must provide an account statement detailing activity for at least the prior six months, including a comprehensive summary of all patron activity up to a year. This includes deposits, withdrawals, win or loss statistics, account balances, and self-imposed RG limits. Similarly, Connecticut mandates that, on

demand, players must receive win or loss statistics, along with their beginning and ending account balances.

- 3. Player Protection While Gambling:** Italy mandates that no gameplay can occur without RG links 24/7. This emphasis on the constant availability of RG information is mirrored in several US states and Canadian provinces.

In New Jersey, regulations include provisions that prevent the gambling system from inducing players to continue placing wagers, especially when a session is ending or when a player wins or loses a bet. This is a significant player protection measure aimed at reducing behaviours such as loss chasing. In a similar vein, Ontario prohibits autoplay features in online slots, requiring players to manually initiate each game, and ensuring that games do not encourage chasing losses.

- 4. Player Awareness and Feedback**

Canadian provinces adopt varied approaches to RG awareness, ranging from proactive assessments and personalized interventions to placing greater responsibility on players themselves. Ontario's approach involves periodic measurements of player awareness regarding RG information and addressing any identified gaps, via a yearly player survey.

Provinces under ALC's jurisdiction, such as PEI, New Brunswick, and Nova Scotia, engage in flexible approach where the operator can adjust communications, marketing, and even product offerings based on the player's risk rating. In Quebec, the responsibility is placed more on the player, with a legal statement absolving Loto-Québec from liability for any decisions made by players, a contrast to the more proactive information provision seen in other regions.

Conclusion:

- The regulations governing in-play gambling not only focus on responsible gambling interventions during active gaming sessions but also place significant emphasis on advertising controls. Many jurisdictions implement stringent rules to prevent misleading, irresponsible, or harmful advertisements from targeting vulnerable players during gameplay. These regulations ensure that ads do not promote excessive gambling, exploit vulnerable individuals, or suggest that gambling is a solution to financial or social problems. Pop-up notifications and in-game advertisements are often required to include responsible gambling messages and must avoid content that appeals to minors or encourages reckless behaviour. Together, these measures aim to create a safer and more transparent gambling environment, combining real-time player protection with strict advertising standards.

Loyalty Program

Loyalty Program Regulations

Regulations around loyalty programs are sparse. In Canada loyalty program regulations differ in scope across jurisdictions, with both Ontario and Quebec implementing rules to protect consumer rights but with distinct approaches. Ontario amended its Consumer Protection Act (CPA) in 2016 to prohibit the expiration of rewards points solely due to the passage of time. Points can only expire under specific conditions, such as for goods or services valued at \$50 or less or due to account inactivity, emphasizing consumer protection while allowing for limited exceptions.

Quebec's 2019 amendments to its Consumer Protection Act similarly prohibit point expiration due to time alone but allow expiration for inactivity if no points have been earned or redeemed for at least one year and if the consumer is notified 30 to 60 days prior. Additionally, Quebec's regulations impose pre-disclosure requirements regarding earning, redeeming, and expiring points and forbid unilateral amendments that devalue points or disadvantage the consumer. Merchants in Quebec are also prohibited from disproportionately increasing the number of points required for goods or services relative to retail price increases. Quebec follows a similar rule to Ontario, exempting loyalty programs for single goods or services or those with a retail value below \$50.

VIP Accounts

In response to concerns over problematic practices within VIP gambling schemes, the UK Gambling Commission introduced regulatory measures in September 2020 aimed at enhancing oversight and safeguarding player welfare.

To classify an individual as a VIP under the new regulations, operators must ensure that the individual's expenditure is both reasonable and sustainable based on their financial situation. Additionally, operators are required to assess whether the person is currently experiencing, or is vulnerable to, gambling-related harm. It is further mandated that operators maintain accurate and up-to-date information regarding the individual's identity, occupation, and sources of income. Ongoing evaluations must be conducted to monitor for potential gambling harm, with regular updates on the individual's financial and occupational details.

These measures introduced by the UK Gambling Commission signify a crucial shift toward more stringent control over VIP schemes, with a focus on protecting individuals from gambling harm and ensuring responsible operator conduct. By mandating affordability checks, continuous risk assessments, and stringent verification processes, these regulations aim to foster a safer and more transparent gambling environment for high-spending individuals while curbing potentially harmful practices.

Account Funding and Financial Transactions: Regulations governing account funding and financial transactions across jurisdictions are designed to ensure transparency, promote responsible gambling, and uphold the integrity of gambling activities. For example, Pennsylvania regulations prohibit loans to credit a personal gambling account and requiring the maintenance of written records for any discharge of debts. This rule is aimed at preventing players from gambling beyond their means and ensuring transparency in financial transactions. Connecticut has stringent rules requiring that online gambling accounts be funded from a patron's bank account and not from a trust or business entity, with only one credit or debit card linked to an account at any time. New Jersey similarly mandates that accounts must be funded through verified personal credit or debit cards, or reloadable prepaid cards issued to the patron. This ensures that the source of funds is legitimate and directly tied to the individual player, minimizing the risk of fraud or money laundering.

In Canada, Alberta's regulations stipulate that players must have sufficient funds in their accounts to complete purchases and that transactions cannot be processed after a cut-off time.

Conclusion:

The examination of loyalty programs, VIP accounts, and merchandise purchasing highlights a consistent focus on consumer protection, financial transparency, and responsible gambling. Loyalty program rules, though limited, emphasize the retention of rewards and impose conditions on expiration, with requirements for clear communication and fairness in managing these programs. The oversight of VIP accounts involves affordability checks and ongoing risk assessments to address potential gambling-related harms, aiming to ensure responsible practices for high-spending individuals. Similarly, regulations on account funding and financial transactions promote transparency and aim to prevent fraud or excessive gambling by verifying sources of funds and ensuring responsible player behaviour. Collectively, these measures aim to create a more secure and equitable environment for all players, balancing consumer rights with responsible operator conduct.

Social Interactions

Online Chats

Employee training on RG is a key focus in various jurisdictions, where operators are required to equip staff with the knowledge to identify and assist problem gamblers. Training programs often include specific measures for recognizing problematic behaviours and supporting self-exclusion efforts. Additionally, jurisdictions emphasize the availability of player support, mandating 24/7 customer care services dedicated to RG, with some regions requiring staff to provide information on treatment organizations. Despite advancements in regulating social interactions through online chats, regulation of RG practices in online forums remains absent.

1. **Employee Training:** In the UK, operators are mandated to provide training to staff on identifying and aiding problem gamblers.

This requirement is echoed in several US states, such as West Virginia, Delaware, Nevada, and others, where onboarding programs include problem gambling awareness training for employees. In New Jersey, there is a stringent requirement that employees of internet gaming operators who perform problem player detection or similar functions must be physically present in the state. Additionally, these employees must undergo regular training on recognizing problem gambling behaviours, assisting players with self-exclusion, and responding to patrons or third parties who disclose gambling-related issues. This level of specificity is not mirrored in other jurisdictions.

In Canada, similar onboarding programs are present in provinces like Ontario, where training for managers and staff on RG policies is mandatory. This training not only covers control activities but also involves continuous evaluation to incorporate best practices and employee feedback. Likewise, in provinces like Prince Edward Island (PEI), New Brunswick, and Nova Scotia, the Atlantic Lottery Corporation (ALC) provides training to its Customer Care team to recognize distress and know when to use support lines. In British Columbia, staff are trained to provide RG information and address common misconceptions about gambling odds when queried. In Quebec, the focus is somewhat different, with regulations forbidding clients from transmitting inappropriate content through chats, indicating a concern with maintaining appropriate communication standards rather than solely focusing on RG.

- 2. Availability of Player Support:** In the United States, New Jersey, Michigan, and Connecticut as well as the Canadian provinces, British Columbia, Ontario, and Atlantic provinces require 24/7 availability of customer support with a focus on RG. In Ontario, live customer support is required to provide contact information for organizations dedicated to treating gambling-related harm.

Online Forums

While there is a universal recognition of the need for regulation across these jurisdictions, there are currently no regulations in place regarding the implementation of RG in online forums.

Conclusion:

The regulatory frameworks surrounding social interactions in gambling, particularly through online chats and customer support, emphasize a commitment to responsible gambling and player welfare. Across jurisdictions, the requirement for employee training on identifying and assisting problem gamblers is a common feature, with some regions mandating continuous education and specific protocols for addressing gambling-related harm. The 24/7 availability of player support, with a focus on responsible gambling resources, further illustrates a proactive approach to ensuring players have access to assistance at any time. However, the absence of formal regulations for responsible gambling in online forums highlights a gap in the current regulatory landscape, suggesting an area for potential future development as online social interactions in gambling continue to evolve.

Reference Materials

Self-Assessments

Many jurisdictions prioritize informed decision-making in gambling by providing players with resources to understand the associated risks and promote responsible play. This is facilitated through educational materials, self-assessment tools, and play management features, allowing individuals to reflect on their gambling behaviours. The use of third-party tracking and risk assessment tools further supports RG, with some regions offering players direct access to their risk ratings. Additionally, several jurisdictions mandate the promotion of problem gambling helplines, ensuring that players have easy access to support.

- 1. Emphasis on Informed Decision-Making:** Many jurisdictions place a strong emphasis on ensuring that players are well-informed about the risks of gambling and how to play responsibly. The UK and Italy, as well as in Canadian provinces like Ontario, Alberta, and British Columbia achieve this through the provision of educational materials, prominently displayed RG information, and tools such as self-assessment and play management features.
- 2. Self-Assessment Tools:** Both the Canadian provinces of Prince Edward Island, New Brunswick, Nova Scotia, and Ontario, as well as some U.S. states, offer self-assessment tools to players. These tools allow individuals to evaluate their gambling behaviour independently. The self-assessment process is generally non-clinical, self-reported, and used for informational purposes.
- 3. Third-Party Tracking and Risk Assessment:** Canadian jurisdictions, particularly those managed by the Atlantic Lottery Corporation (ALC), engage in third-party tracking and provide players access to their risk ratings within their accounts.
- 4. Mandatory Problem Gambling Helplines:** Several U.S. states, including Pennsylvania, Rhode Island, and New Jersey, require the promotion of a problem gambling hotline number (e.g. 1-800-GAMBLER), to provide crisis counseling and referral services. This reflects a broader trend of ensuring players have easy access to immediate help if needed.

Tips

A common focus across various regions is the 24/7 availability of RG information aimed at promoting safe gambling practices. Operators are generally required to provide continuous support, offering players tools and resources to manage their gambling behaviour effectively. These resources often include practical tips, information on gambling risks, and educational content debunking common myths. In many areas, regulations ensure that RG information is

prominently displayed and updated to reflect current practices, particularly for online and digital environments.

Availability of RG Information

A common feature across jurisdictions is the 24/7 availability of RG information and resources aimed at promoting safe gambling practices. In the UK and Italy, there is a broad expectation that operators provide continuous support and information to help players manage their gambling behaviour.

In the US, several states such as New Jersey, Rhode Island, and Connecticut also require 24/7 access to RG information. New Jersey mandates that practical tips for staying within safe limits, myths about gambling, and information on gambling risks must be displayed on the patron protection page. Moreover, New Jersey imposes restrictions on where such information can be displayed within casino premises, excluding certain restricted areas within Atlantic City. Similarly, Rhode Island requires that RG education and prevention resources be continuously available and that existing resources be updated to include information specific to iGaming.

In Canada, provinces like Prince Edward Island (PEI), New Brunswick, and Nova Scotia, under the Atlantic Lottery Corporation (ALC), offer the "ALC Healthy Play" program, designed to provide players with tools and resources to make informed gambling decisions and prevent gambling-related harm. These resources are accessible 24/7 through the "Play Responsible" page of ALC. British Columbia similarly mandates that information on common myths and house edge be prominently available to players. Operators in Ontario, British Columbia, and Alberta offer similar programs.

Game Information

Across most jurisdictions, there is a requirement for gambling operators to provide details on game rules, odds, risks, and access to problem gambling resources.

In the UK, the Gambling Commission mandates that facilities for gambling must ensure that games are conducted fairly and openly, with clear guidelines provided to operators. Similarly, in Italy, operators must make RG pages readily accessible, ensuring that all game-related information, including rules, return to player (RTP) percentages, and gameplay instructions, is *always* available to players.

In the US, states such as New Jersey, Nevada, and Rhode Island require operators to provide comprehensive game information, including wager rules, payout odds, and game instructions, with New Jersey emphasizing real-time availability of such information. Delaware regulations

specify payout ranges for video lottery machines and table games. Additionally, Rhode Island mandates that iGaming platforms display wagering rules and payout information prominently.

In Canada, the emphasis on transparency and RG is also evident. Provinces like Prince Edward Island (PEI), New Brunswick, and Nova Scotia require that game features such as prize structures, odds, and RTP percentages be clearly displayed in the "PlayWise" section of ALC's website. These provinces also emphasize healthy play tools and transparency, with requirements for session time reminders, mandatory breaks, and clear information about game features. British Columbia similarly mandates that information on how games work is available and easily accessible to players. This structured approach contrasts with Manitoba, Saskatchewan, and Quebec, where the regulatory framework is less detailed in terms of specific RG initiatives related to the provision of game information. Alberta mandates that game instructions be accessible on each slot terminal and electronic table game; however, there are no legal requirements compelling the disclosure of odds or additional information, leaving the provision of such details to the discretion of operators.

Conclusion:

- The review of self-assessments, responsible gambling information, and game transparency across various jurisdictions underscores a collective focus on promoting informed decision-making and enhancing player protection. While many regions emphasize the availability of self-assessment tools and educational resources, there are notable differences in the implementation of third-party tracking and risk assessments. The consistent requirement for 24/7 access to responsible gambling materials and game information further reflects a shared commitment to transparency and player welfare. However, the depth and scope of these measures, such as the mandatory disclosure of game odds or the integration of healthy play tools, vary significantly, indicating diverse regulatory priorities in managing gambling-related harm. These approaches collectively illustrate an evolving landscape in which responsible gambling support and player protection continue to adapt to technological advancements and regional regulatory goals.

Withdrawal

Regulations governing the process of players claiming winnings and withdrawing funds from their accounts vary across jurisdictions but maintain a shared focus on consumer protection and anti-fraud measures. Identity verification is a crucial step, especially for high-value withdrawals, to ensure compliance with anti-money laundering laws and safeguard transactions. Many regions also implement specific protocols for handling withdrawals,

emphasizing timely and secure transfers while verifying the ownership of both player accounts and destination accounts.

1. **Identification and Anti-Fraud Measures:** Canadian regulations across all provinces are aligned with federal anti-money laundering laws. Quebec requires identity verification for winnings exceeding \$100,000, reflecting a strong focus on safeguarding high-value transactions. Ontario mandates verification of the player's account and legal ownership of the destination account before any withdrawal is permitted. Similarly, Alberta's regulations require identity verification for withdrawals and set a minimum withdrawal amount, emphasizing player identification and security. In the Atlantic provinces, withdrawals are limited to electronic funds transfers, with stringent requirements for identity verification and compliance with financial regulations.

Italy implements a tiered verification process for withdrawals, requiring players to present valid identification and documentation for withdrawals exceeding €5,200, while the United States mandates comprehensive verification processes, including proof of bank account, address, and photographic ID, to prevent fraud.

2. **Financial Transaction Protocols:** Many jurisdictional regulations highlight protocols for handling financial transactions. U.S. states such as Michigan and Connecticut emphasize the timely processing of withdrawals, with additional protections in place during investigations or disputes. In Connecticut, there are specific guidelines for cash-outs, where funds must be transferred directly to the patron and not to a trust or business account.

In the United Kingdom, players are granted the right to withdraw their deposit balance at any time, provided the operator complies with regulatory obligations. However, reasonable withdrawal fees may apply, and operators can limit withdrawal sizes or frequency, provided such practices are transparent.

Conclusion:

- The examination of withdrawal regulations across multiple jurisdictions highlights a common focus on ensuring the security and integrity of financial transactions, while approaches to anti-fraud measures, and transaction protocols vary amongst jurisdictions. Jurisdictions uniformly prioritize identity verification, particularly for high-value transactions, to prevent fraud and comply with anti-money laundering laws. Financial transaction protocols, including timely withdrawal processing and the application of reasonable fees, reflect a commitment to both consumer protection and regulatory compliance. Although the specific requirements differ, the overarching goal is to balance player access to funds with stringent security measures, reinforcing the trustworthiness of gambling-related financial activities.

Customer Initiated Contact

Account Restriction

Regulatory frameworks across multiple jurisdictions have imposed stringent restrictions on credit extensions, fund transfers, and the management of gambling accounts to ensure responsible gaming practices and mitigate financial risks to players.

1. **Restrictions on Credit Extensions and Fund Transfers:** Several jurisdictions have established clear restrictions on credit extensions and the movement of funds between accounts. In April 2020, the UK introduced a comprehensive ban on the use of credit cards for both online and offline gambling. This regulation prohibits licensed gambling operators from accepting credit card payments, including those processed through money service businesses. Certain operators, such as Playtech, have committed to adhering to these UK practices in their operations. Italy prohibits the extension of credit to players and disallows the direct transfer of funds from one game account to another.
2. Similarly, in the United States, Delaware regulations stipulate that procedures are required for the acquisition, transfer, or withdrawal of funds from accounts, ensuring that financial transactions are regulated and monitored. Both Nevada and Pennsylvania explicitly prohibit the extension of credit to players. Nevada specifies that operators cannot allow deposits derived from credit extensions, while Pennsylvania regulations state that credit cannot be extended to enable players to participate in slot machine games.
3. In Canada, Saskatchewan similarly prohibits the extension of credit and bans the issuance of tickets or chips in exchange for credit, including credit cards or third-party checks. Alberta regulations also prohibit the extension of credit in any form by casino facility licensees or staff, aligning with the general prohibition seen in other regions. Alberta's prohibition stands out in its broad application to all forms of credit extension by various casino-related

personnel, including volunteers and charity workers. This contrasts with other jurisdictions where the focus is primarily on operators and licensees.

- 4. Management of Negative Account Balances:** Jurisdictions such as New Jersey and Connecticut emphasize strict control over negative account balances. In New Jersey, accounts with a negative balance are suspended, while in Connecticut, patrons cannot deposit additional funds into an account that is negative, except to bring the balance back to zero. This reflects a broader commitment to promoting fiscal responsibility, a safer gambling environment, and ensuring that players manage their accounts within their financial means.
- 5. Breaks in Play and Account Management:** In Canadian provinces like Prince Edward Island, New Brunswick, and Nova Scotia, there is a mandatory break in play after five hours, where all players are automatically logged off. Atlantic provinces do allow for marketing messages to continue being sent to players even when they are on a break from gambling. This is different from full self-exclusion, where marketing would typically be halted. Alberta's approach is to prohibit a balance exceeding players' set limit for more than 72 hours, with the Alberta Gaming, Liquor and Cannabis (AGLC) initiating withdrawals on the player's behalf if this limit is exceeded.

Conclusion:

- The regulatory frameworks governing customer-initiated contact, account restrictions, and fund management reflect a strong commitment to promoting responsible gambling and mitigating financial risks. A common theme across jurisdictions is the prohibition of credit extensions and stringent controls on fund transfers, designed to prevent players from gambling beyond their means. Additionally, mechanisms for managing negative account balances and enforcing breaks in play illustrate the emphasis on maintaining player financial well-being and preventing excessive gambling. Despite variations in implementation, these regulations collectively aim to safeguard players by ensuring that their gambling activities are conducted responsibly and within predefined financial limits.

Between Sessions

Loyalty Programs/Advertisements

Regulations governing responsible advertising and marketing in the gambling sector prioritize consumer protection and RG practices. Common features include restrictions on targeting minors, prohibitions against misleading advertisements, and requirements for incorporating RG messages in promotional content. Some regions offer players more control over the marketing

they receive, allowing them to opt-out of certain promotional activities without affecting gameplay.

In the UK, advertising regulations prioritize responsible marketing practices, mandating that advertisements should not target children or mislead consumers, thereby emphasizing a strong commitment to consumer protection and RG.

Italy also prioritizes responsible marketing and uniquely allows players to opt-out of certain promotional activities without losing their ability to continue playing. This approach gives players more control over the marketing content they receive, which is not a common feature in the regulations of other regions.

In Canada, Ontario mandates that all gambling advertising must include a RG message and adhere to strict content and dissemination guidelines. These regulations prohibit depictions of minors, require RG messaging, and restrict the placement of advertisements near youth-oriented venues. In contrast, Quebec uses customer profiles to personalize its marketing efforts, incorporating both promotions and RG messages. This targeted approach differs from provinces like Ontario, PEI, New Brunswick, and Nova Scotia, where marketing during breaks is standard but less personalized.

Nudges

Behavioural nudges and inactivity timeouts are emerging tools in the regulation of online gambling, with a focus on promoting RG practices and protecting consumers. While some jurisdictions are exploring the impact of behavioural nudges, there is limited data on their effects or potential regulatory challenges, particularly regarding their influence on consumer spending. In contrast, inactivity timeouts, which automatically log users off after periods of inactivity, are more widely implemented to ensure player protection and RG habits.

- 1. Behavioural Nudges:** The United Kingdom is currently examining the use of behavioural nudges in the online gambling sector but is waiting for data that rigorously quantifies their effects or the barriers they may present. Their position is that it remains challenging to accurately estimate the extent to which these nudges may influence consumer spending or revenue generation that would not have otherwise occurred, as well as to assess the impact of potential regulatory changes. In contrast, most jurisdictions in the United States and Canada acknowledge the value of positive nudges that encourage RG behaviour. However, there are presently no regulatory frameworks addressing either these positive nudges or the potentially harmful nudges that may prompt excessive gambling behaviour. In British

Columbia, efforts are made to promote informed play through the provision of information and nudges aimed at increasing player awareness of their time and monetary expenditures.

2. **Inactivity Timeouts:** Both Italy and Delaware, in the United States, implement inactivity timeouts to protect users. Italy mandates a 15-minute inactivity timeout, where users are automatically logged off after 15 minutes of inactivity. Similarly, Delaware also requires users to be automatically logged off after a specified period of inactivity, although the exact time frame is not specified, it shares the same principle of ensuring users are logged off after a period of inactivity.

Self-Exclusion

Self-Exclusion Policies

Self-exclusion programs provide critical safeguards for individuals seeking to limit their gambling activities. Many regions mandate the immediate implementation of self-exclusion upon request, with varying degrees of integration across physical and online platforms. These programs are designed to offer flexible exclusion periods and enforce strict measures, such as restricting financial transactions and removing individuals from marketing lists, to protect players from potential harm during their self-exclusion.

1. **Availability and Implementation of Self-Exclusion Programs:** Across all jurisdictions self-exclusion programs are universally available on a 24/7 basis and most mandate the immediate implementation of self-exclusion upon request. This immediate effect is crucial in preventing further gambling activities as soon as a player decides to self-exclude, thereby minimizing potential harm. Interestingly, Quebec's system of self-exclusion from gaming halls or casinos automatically blocks the individual's online account, reflecting an integrated centralized approach across different gambling platforms. Other Canadian provinces and U.S. states typically have separate exclusion processes for physical and online gambling environments, lacking such cross-platform integration. Nonetheless, in jurisdictions with multiple operators, a simplified centralized system for self-exclusion from all online gambling operators such as that being implemented in Ontario, will be the most beneficial for consumer protection.
2. **Comprehensive Self-Exclusion Options:** In several jurisdictions, including the UK, Italy, and many U.S. states (e.g., Delaware, Nevada, Pennsylvania, New Jersey, Michigan), as well as Canadian provinces (e.g., Alberta, British Columbia, Ontario), self-exclusion programs are designed to be comprehensive, offering multiple options for exclusion periods. This ensures that players have the flexibility to choose the duration that best suits their needs. For

instance, Delaware offers specific exclusion periods (lifetime, five years, one year), whereas Nevada focuses on closing accounts and removing individuals from marketing lists.

- 3. Enforcement of Self-Exclusion:** Across several Canadian provinces, there is a focus on enforcing self-exclusion policies and protecting players who have opted for self-exclusion. In Ontario, operators are required to identify and remove self-excluded persons from the gaming site, while in Manitoba and other provinces under the Atlantic Lottery Corporation (ALC), excluded individuals are prevented from withdrawing funds or bonuses during self-exclusion. This consistency demonstrates a shared commitment to supporting individuals who choose to exclude themselves from gambling activities.
- 4. Monetary Policies During Self-Exclusion:** In most jurisdictions, operators are required to return a player's deposits upon the initiation of self-exclusion. For example, in Italy, Ontario, and the United Kingdom, operators must close the player's account and refund any remaining balance.

Additionally, some jurisdictions prohibit players from retaining winnings obtained during self-exclusion. For instance, both Rhode Island and Alberta enforce strict conditions, including the forfeiture of winnings, with Alberta also allowing for potential legal action if self-exclusion terms are breached.

- 5. Marketing and Communication Restrictions:** In the UK, Italy, and most jurisdictions in Canada and the United States require that individuals enrolled in self-exclusion programs be removed from all marketing communications. This measure is intended to reduce the temptation to resume gambling during the exclusion period.

Alternatives to Self-Exclusion

Many jurisdictions offer both temporary and permanent self-exclusion options, supported by mechanisms that prevent excluded individuals from re-engaging in gambling activities. Additionally, self-limitation tools allow players to set personal limits on deposits, bets, or time spent gambling, with enforcement occurring immediately or shortly after the request. Time-based breaks, ranging from 24 hours to three months, are also commonly available, providing players with short-term relief without committing to long-term exclusion.

- 1. Implementation of Self-Exclusion and Self-Limitation Mechanisms:** Jurisdictions like Italy, Pennsylvania, and several Canadian provinces offer both temporary and permanent self-exclusion options, with mechanisms in place to prevent excluded individuals from re-engaging in gambling activities. Additionally, many regions also provide self-limitation tools

that allow players to set personal limits on deposits, bets, or time spent gambling, which are immediately or promptly enforced upon request.

- 2. Time-Based Breaks and Self-Exclusion:** Time-based breaks as an alternative or addition to formal self-exclusion are commonly offered. For example, The UK, Canadian provinces such as British Columbia, Ontario, PEI, New Brunswick, Nova Scotia, and some jurisdictions in the United States, such as New Jersey, allow players to suspend their accounts or take short-term breaks, ranging from 24 hours to three months. This option is designed to give players temporary relief without the permanence of full self-exclusion.

Signs of Problem Gambling

Regulations in various jurisdictions mandate the development of RG policies focused on detecting and addressing problem gambling. These rules require continuous availability of RG information and educational materials, reflecting a shared commitment to promoting safe gambling practices and preventing harm. Implementation occurs through RG programs that establish evidence-based standards, assess operator compliance with regulatory guidelines, and provide direct support to players and staff through educational resources and trained advisors, ensuring informed decision-making and assistance for those in need.

- 1. Player Assistance and Detection of Problem Gambling:** Both the UK and Ontario, Canada, stand out for their requirement that operators develop and implement RG policies, procedures, and training to assess, detect, and address situations where players may be experiencing harm.

Programs in Ontario, such as RG Check and PlaySmart, play significant roles in RG education and prevention by addressing signs of problem gambling. RG Check establishes evidence-based standards, developed by independent experts, to guide gambling venues and iGaming sites in minimizing gambling-related harms. By evaluating operators' RG practices against these standards, RG Check provides an assessment of policies and procedures, with the aim of reducing risks and ensuring player protection.

PlaySmart complements RG Check by offering direct support and educational resources to gamblers, affected individuals, and venue staff. Its primary goal is to provide information for informed decision-making about gambling and immediate assistance when issues arise. PlaySmart Centers, present in various locations, offer access to trained advisors who provide guidance, support, and referrals to professional services.

The training provided to PlaySmart Advisors, which includes mental health first aid, motivational interviewing, and suicide intervention techniques, equips staff to address a

broad range of gambling-related concerns. This specialized training supports the program's overall objective of promoting RG and ensuring player protection in Ontario.

The GameSense program in Alberta is similarly structured and offers comparable support, activities, and educational initiatives aimed at promoting RG.

Reinstatement

Many jurisdictions have established mandatory reinstatement procedures for self-excluded individuals, requiring specific protocols to be followed before allowing them to resume gambling activities. These procedures often include a waiting period and additional steps, such as viewing RG materials, to ensure informed decision-making. The aim is to promote responsible behaviour and minimize the risk of harm as individuals re-engage with gaming.

- 1. Mandatory Reinstatement Procedures:** A commonality among Nevada, New Jersey, and the Canadian provinces of PEI, New Brunswick, and Nova Scotia is the establishment of specific protocols for the reinstatement of self-excluded individuals. In Nevada, a reasonable amount of time, but not less than 30 days, must elapse before a self-excluded individual can engage in gaming again. In New Jersey, if reinstated, the casino licensee must notify the operator within 24 hours of the reinstatement. Similarly, in the Canadian provinces, reinstatement is conditional upon the individual viewing a responsible gaming video on the Atlantic Lottery Corporation (ALC) website, underscoring the importance of informed decision-making before resuming gambling activities.

Conclusion:

- The implementation of self-exclusion policies across jurisdictions demonstrates a broad commitment to providing support for individuals who wish to control their gambling activities. With 24/7 availability and immediate enforcement of exclusion requests, these programs aim to prevent further gambling as soon as a player opts for self-exclusion. Many regions offer flexible exclusion periods and varying approaches to integration between physical and online platforms, ensuring that players have access to a range of options suited to their needs. The management of financial accounts during self-exclusion also differs, with some jurisdictions allowing withdrawals while others impose restrictions, reflecting diverse regulatory priorities.
- Additionally, reinstatement procedures for self-excluded individuals illustrate structured processes designed to ensure responsible re-entry into gambling. Mandatory waiting periods and requirements, such as viewing responsible gambling videos or undergoing specific procedural steps, emphasize the importance of informed decision-making before resuming gaming activities. These variations in approach reflect the differing levels of intervention and oversight employed across jurisdictions, but the shared goal remains to mitigate gambling-related harm and encourage responsible

Other

Jurisdictions typically establish detailed regulatory and reporting requirements for the gambling industry, including mandates for annual reports on problem gambling impacts and financial contributions to harm reduction programs. Financial provisions often require operators to allocate a portion of their revenue to fund gambling education, research, and treatment, with some regions designating specific percentages or amounts. Additionally, stakeholder consultation plays a significant role in shaping RG regulations, with input from governmental bodies, industry experts, and social service organizations ensuring comprehensive oversight and implementation.

1. **Regulatory and Reporting Requirements:** Most jurisdictions have detailed regulatory and reporting requirements. For instance, Pennsylvania mandates an annual report on the impact of interactive gaming on compulsive and problem gambling, which must be distributed to the governor.
2. **Specific Provisions for Financial Contributions to Gambling Education, Research, and Harm Reduction Programs:** Both Delaware and Pennsylvania have requirements around contributions to problem gambling programs. Delaware requires a specific amount (the greater of \$25,000 or 1% of revenues) to be returned to the state to fund programs

dedicated to the treatment, education, and assistance of compulsive gamblers and their families. Similarly, Pennsylvania dedicates a specific percentage of gross gaming revenue is allocated to drug and addiction treatment services. In Canada, the province of Manitoba mandates that 2% of net revenue each fiscal year be allocated to promoting responsible gaming, while in British Columbia, the BC Lottery Corporation (BCLC) invested approximately \$1.4 million in the Centre for Gambling Research at UBC in 2023. In Ontario, in addition to a recent \$9 million investment through the Responsible Internet Gambling Fund (RIGF) for RG initiatives, the Ontario Ministry of Health and Long-Term Care has sustained a long-standing funding model for prevention, treatment, and research established in the early 2000s. This model underscores the province's commitment to RG, with funds supporting public education, resources, programs, and services delivered through non-profit organizations and mental health providers. This network of stakeholders plays a crucial role in offering services across the player risk spectrum. These explicit and structured financial commitments contrast with other jurisdictions where contributions to problem gambling programs may be less defined or integrated into broader RG efforts.

- 3. Consultation and Stakeholder Involvement:** Both the United Kingdom and provinces within Canada emphasize the importance of consultation with various stakeholders in the development and implementation of gambling regulations. The UK requires consultation with governmental bodies, industry representatives, and experts on social problems related to gambling before issuing or revising codes of practice. Similarly, in the Canadian province, New Brunswick, the responsible gaming policy must be submitted to and approved by the Lieutenant-Governor in Council, ensuring that multiple levels of oversight and input are involved.

Key Findings from Jurisdictional Scan

The global commitment to RG is evident across a wide range of jurisdictions, each striving to safeguard players and promote sustainable gambling practices. This dedication is reflected in the various regulations and strategies implemented to address the delivery of RG messaging throughout the player journey. This section highlights areas of potential improvement of RG practices—based on the players journey map —across different regions. Specifically, as seen in Figure 2 below, there are player journey touchpoints in which regulation has built a strong foundation for RG initiatives. These touchpoints are indicated in green Figure 2. However, despite the strong foundation of RG measures, our jurisdictional scan demonstrates that there are touchpoints in which policy enhancements in some jurisdictions would serve to optimize player protection and well-being (see yellow touchpoints in Figure 2). Also, there are touchpoints along the player journey where RG practices could be improved across multiple regions and these touchpoints are red in Figure 2. By identifying opportunities for

improvement, particularly at touchpoints in the player journey that have previously been under-utilized for RG messaging delivery, and in jurisdictions where regulations are less stringent, this analysis aims to contribute to the ongoing efforts to refine RG strategies and ensure they effectively meet the diverse needs of the gambling population.

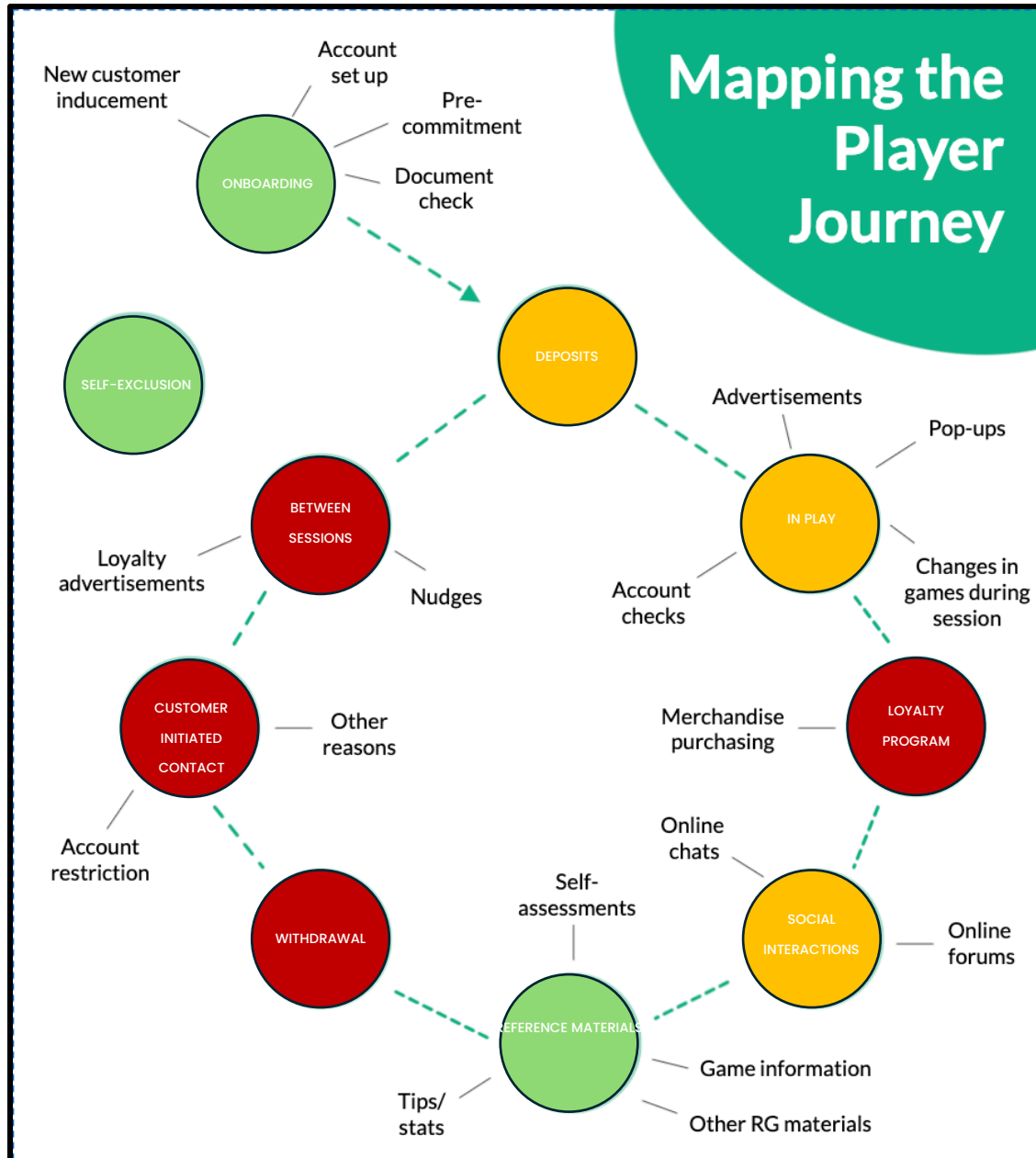


Figure 2. Touchpoints in green were found to have relatively strong policies across multiple jurisdictions. Touchpoints in yellow were identified as having inconsistent and/or less stringent policies across some jurisdictions. Touchpoints in red are points in the player journey that are under-represented in policy and could contribute to the optimization of RG delivery and player protection.

1. **Onboarding:** This touchpoint is green because regulatory frameworks governing online gambling demonstrate a common emphasis on player protection through minimum age requirements, account limitations, and identity verification processes. Many jurisdictions, including the U.S., Canada, and Italy, enforce one-account-per-operator rules and impose strict identity verification to ensure compliance with age restrictions. Variations exist in the management of gambling limits, with Manitoba mandating predefined limits during registration, contrasting with more flexible approaches in other regions. Additionally, geolocation enforcement and residency requirements are critical across jurisdictions, with technical measures ensuring that players engage in gambling activities only within legally permitted areas.

Gap Assessment: Despite the green highlight, there are differences between jurisdictions that emerge in the level of detail required for record-keeping, particularly in account management, where some regions enforce more comprehensive data retention than others. Additionally, certain jurisdictions mandate stricter requirements for setting gambling limits, while others offer more flexibility. There are also variations in transparency requirements for competitive gaming, with some regions requiring more detailed disclosures than others. It is recommended that jurisdictions seeking to enhance RG practices adopt more robust reporting and transparency policies, aligning with those regions that enforce comprehensive data retention and detailed disclosures. Implementing stricter record-keeping and transparency measures would not only ensure greater oversight of gambling activities but also promote player accountability and operator responsibility. By providing regulators with a clearer view of player behavior and operator practices, such policies would facilitate better monitoring of gambling harms and allow for more effective interventions.

2. **Deposits:** Regulations in this touchpoint are highlighted yellow. The regulatory frameworks governing deposit limits and RG measures across various jurisdictions display a shared commitment to promoting RG yet diverge significantly in their operational specifics and player autonomy. While the UK and some U.S. states provide continuous options for players to set their own limits, Canadian provinces like Quebec enforce predefined weekly limits and require cooling-off periods for limit increases. Italy's regulatory approach stands out for its granular and mandatory self-limitation mechanisms, applied upon a player's next login. Additionally, certain Canadian provinces incorporate educational tools, while U.S. jurisdictions focus on straightforward warning systems, reflecting diverse strategies for encouraging RG.

Gap Assessment: Jurisdictions generally prioritize RG and deposit limits but differ in player autonomy and operational procedures. Some regions allow immediate changes to deposit

limits, while others impose cooling-off periods. Accessibility to educational resources also varies. Strengthening deposit limit enforcement and improving identity verification during deposits are areas where regions can benefit from following practices of jurisdictions with stricter procedures, particularly to combat automated play.

- 3. In Play:** This touchpoint is highlighted yellow. Jurisdictions worldwide implement various regulations on gambling advertisements and in-play mechanisms to promote RG and protect consumers. Common across regions like Canada, the U.S., and the UK is the requirement for advertisements to encourage moderation and avoid targeting minors, with Ontario and New Jersey including specific protections for high-risk players. RG messages are often mandated in login and play-entry prompts, as seen in Italy and the UK, with periodic pop-ups during sessions reminding players of time spent or deposit limits, such as in New Jersey and British Columbia. Additionally, jurisdictions enforce transparency in wagering limits and game rules, with U.S. states like New Jersey and Nevada requiring clear communication of these limits. Player protection is further bolstered by detailed account tracking and restrictions on autoplay, particularly in regions like Ontario and Italy, which ensure a responsible and transparent gaming environment.

Gap Assessment: Consumer protection and RG are common regulatory goals in in-play gambling, but gaps exist in real-time interventions and addressing high-risk players. Some regions lack transparency in account information and could improve by adopting more robust RG interventions and resources, particularly in managing high-risk behaviour.

- 4. Loyalty Program:** This touchpoint is highlighted in red. Loyalty program regulations in Canada vary by jurisdiction, with Ontario and Quebec focusing on consumer protection through distinct approaches. Ontario's Consumer Protection Act prohibits the expiration of rewards points due to time alone, except under certain conditions, emphasizing the indefinite retention of points. Quebec, in contrast, allows points to expire after a year of inactivity if consumers are notified in advance, while also imposing stricter pre-disclosure requirements and prohibiting unilateral changes that devalue points. Meanwhile, the UK Gambling Commission's 2020 regulations for VIP schemes mandate affordability checks, ongoing risk assessments, and strict verification processes to protect high-spending individuals from gambling-related harm, signifying increased regulatory oversight in loyalty programs.

Gap Assessment: Regulations concerning loyalty programs and VIP accounts show limited regulatory coverage, particularly in ensuring RG practices. Loyalty programs often lack robust protections, with only minimal safeguards to prevent the exploitation of rewards systems or excessive gambling. Similarly, while some oversight exists for VIP accounts, there remains an absence of comprehensive measures to consistently address affordability and

gambling harm across all jurisdictions. Similarly, financial transaction regulations offer some protection, but greater consistency across jurisdictions would enhance transparency and support RG behaviour.

5. **Social Interactions:** This touchpoint is highlighted yellow: Regulatory frameworks across the UK, US, Italy, and Canada emphasize employee training in RG practices, with staff trained to identify and assist problem gamblers and provide 24/7 support. Jurisdictions like the UK and several US states mandate regular training, while Canadian provinces such as Ontario and British Columbia ensure continuous evaluation and improvement of RG policies. Although player support is widely available, including in Canada and certain US states, regulations for RG within online forums remain absent across these jurisdictions.

Gap Assessment: Although employee training and RG support are emphasized in most regulatory frameworks, there remains a notable gap in the management of social interactions within online platforms. While staff are trained to assist players and provide support, the management of social interactions in online forums and chats remains underregulated. This represents an area where more robust oversight could enhance player protection and RG efforts.

6. **Reference Materials:** This touchpoint warrants a green highlight. The integration of self-assessment tools and RG resources is a common feature across jurisdictions like the UK, Italy, Canada, and the U.S., with a strong emphasis on promoting informed decision-making among players. Canadian provinces, such as Ontario and those under the Atlantic Lottery Corporation, provide self-assessment tools and third-party risk tracking, enabling players to monitor their gambling behaviours. In the U.S., states like New Jersey and Rhode Island mandate 24/7 access to RG information and ensure comprehensive availability of game-related data, such as rules and odds. Similarly, provinces in Canada emphasize transparency, requiring operators to display information on odds, RTP percentages, and game rules, while also incorporating player protection tools like session time reminders and mandatory breaks.

Gap Assessment: Many jurisdictions emphasize RG through self-assessment tools and informational resources, but there are notable shortcomings in the consistency and depth of player support systems. The use of third-party tracking and risk assessments is not consistently applied, leaving some regions without advanced monitoring to identify at-risk behaviour. Additionally, RG materials, such as educational content and real-time game information, vary in comprehensiveness. A more consistent integration of proactive player protection measures could further enhance consumer safety.

- 7. Withdrawal:** A red highlight is necessary for this touchpoint. Jurisdictions across Canada, the U.S., Italy, and the UK implement stringent identification and anti-fraud measures to ensure the security of gambling withdrawals, with requirements for identity verification and legal ownership of accounts. Canadian provinces follow federal anti-money laundering laws, with regions like Quebec and Ontario enforcing strict verification processes for high-value transactions, while Italy and the U.S. mandate comprehensive checks for large withdrawals. Financial transaction protocols differ, with U.S. states like Michigan and Connecticut prioritizing timely processing, and the UK granting players the right to withdraw their deposit balance, subject to transparent fees and conditions.

Gap Assessment: While identification and anti-fraud measures are well-established, there are inconsistencies in the thoroughness of financial transaction protocols, particularly concerning withdrawal processes. Additionally, protections for players during disputes and the transparency of withdrawal fees and limits would benefit from more uniform regulatory standards to ensure fairness and security across all jurisdictions. Finally, there were virtually no RG messaging regulations indicated at this touchpoint. Withdrawal of funds could indicate that players are trying to limit their play.

- 8. Customer Initiated Contact:** This touchpoint merits a red highlight. Regulatory frameworks across jurisdictions impose strict restrictions on credit extensions and fund transfers to promote RG and reduce financial risks. The UK bans credit card use for gambling, while Italy and the U.S. prohibit credit extensions and regulate fund transfers between accounts, with similar prohibitions in Canadian provinces like Saskatchewan and Alberta. Additionally, jurisdictions such as New Jersey and Connecticut enforce strict management of negative account balances, suspending accounts or requiring deposits to return balances to zero, reflecting a broader effort to ensure responsible account management and limit financial harm to players.

Gap Assessment: While there are strong restrictions on credit extensions and fund transfers, more uniformity in managing account balances and player breaks could enhance RG protections. Specific measures for handling negative account balances and continuous play are not always applied, which may limit the effectiveness of responsible gaming practices in some regions. Strengthening these aspects could help ensure players maintain control over their gambling activities.

- 9. Between Sessions:** This touchpoint in the player journey receives a red highlight. Jurisdictions worldwide have developed diverse strategies for responsible advertising and marketing in the gambling industry, emphasizing consumer protection and the prevention of misleading promotions. The UK and Ontario require gambling advertisements to avoid targeting minors and to include RG messages, with Quebec taking a personalized marketing

approach based on customer profiles. Italy allows players to opt out of promotional content without forfeiting play, offering greater control over marketing exposure. Additionally, while the UK is currently exploring the impact of behavioural nudges in online gambling, there are currently no regulations present that address behavioural nudges. Finally, Italy and Delaware implement inactivity timeouts to safeguard users, though such measures are absent in many U.S. states and Canadian provinces.

Gap Assessment: Although regulations emphasize responsible advertising and consumer protection, there are areas where oversight of promotional activities and behavioural nudges could be strengthened to better safeguard vulnerable individuals. While responsible marketing practices are generally mandated, not all regions provide sufficient player control over advertisements or address the potential impact of nudges that may influence gambling behaviour. Additionally, inactivity timeout requirements are inconsistently applied, which may limit the effectiveness of RG measures across different jurisdictions.

- 10. Self-Exclusion:** This touchpoint merits a green highlight. Self-exclusion programs are universally available 24/7 across jurisdictions such as the UK, Italy, the U.S., and Canada, reflecting a global commitment to supporting individuals who wish to limit or cease gambling. Many regions, including Italy and Ontario, implement self-exclusion immediately upon request, with Quebec integrating self-exclusion across both physical and online platforms. Comprehensive self-exclusion options, including varied exclusion periods, are provided in the UK, U.S. states like Delaware and Nevada, and Canadian provinces like Alberta and British Columbia, ensuring flexibility for players. Enforcement of self-exclusion is strict, with regions like Ontario and Manitoba actively preventing excluded individuals from accessing funds or gambling sites. Financial regulations during exclusion varies, with many regions simply closing player accounts and returning deposits, while regions like Alberta impose stricter conditions, including forfeiture of winnings.

Note on Self-Exclusion Approaches: Different jurisdictions exhibit varying approaches to self-exclusion programs, reflecting broader philosophical distinctions between abstinence-based and harm reduction models in the context of RG. Jurisdictions that implement stringent, long-term self-exclusion programs align with the abstinence model, which prioritizes the immediate cessation of gambling activities to prevent potential harms. This approach can be highly effective for individuals at significant risk of gambling addiction, offering clear boundaries and reducing the likelihood of relapse. However, its rigidity may not accommodate the needs of all players, particularly those who seek to manage rather than completely abstain from gambling.

Conversely, jurisdictions that adopt more flexible self-exclusion policies reflect a harm reduction model, which aims to mitigate gambling-related risks while allowing continued

participation in gambling activities under controlled conditions. This model can empower players to develop healthier gambling habits and maintain a balanced relationship with gambling. Nevertheless, its less restrictive nature may leave some individuals vulnerable to continued problematic gambling behaviours if the controls are not sufficiently robust. Both approaches present distinct advantages and challenges, highlighting the need for tailored strategies that consider the diverse needs of the gambling population.

Gap Assessment: Self-exclusion programs demonstrate a strong global commitment to RG, offering round-the-clock availability and immediate implementation upon request. However, the integration of self-exclusion across both online and physical gambling platforms is not consistently applied, which may limit the program's effectiveness. While comprehensive self-exclusion options are widely available, the enforcement of these policies, particularly concerning financial accounts and marketing restrictions during exclusion, remains uneven. Furthermore, procedures for reinstatement could benefit from more uniform guidelines to ensure that individuals are adequately supported before re-engaging in gambling activities.

- 11. Other RG Reference Materials:** This touchpoint receives a green highlight. Jurisdictions across the U.S., Canada, and the UK have established robust regulatory frameworks emphasizing financial contributions to problem gambling programs, stakeholder consultation, and governance to promote responsible gaming. U.S. states like Pennsylvania and Delaware mandate annual reports and financial contributions to gambling education and harm reduction, while Canadian provinces, such as Manitoba and Ontario, allocate a percentage of gaming revenue to RG initiatives. The UK and Canadian provinces also emphasize stakeholder consultation in regulatory processes, reflecting a commitment to mitigating gambling-related social harms through collaborative governance and structured financial support for prevention and treatment programs.

Gap Assessment: While regulatory requirements and financial contributions to RG programs are well-established in many jurisdictions, some regions could improve by adopting clearer commitments. These areas often lack clearly defined financial obligations to problem gambling initiatives, and stakeholder involvement in policy development is inconsistent. A more systematic integration of governance practices and consultation mechanisms could contribute to a more comprehensive approach to RG in many regions.

Conclusion:

- The commitment to responsible gambling across jurisdictions is commendable, with numerous strategies already in place to protect players and promote healthy gambling behaviours. However, this analysis has identified specific areas where further improvements could be made to enhance the effectiveness of RG measures. Strengthening onboarding protocols, tightening deposit controls, ensuring continuous in-play protections, and refining self-exclusion programs are all critical steps toward achieving more comprehensive player protection. By addressing these areas, jurisdictions can build on their existing RG frameworks, ensuring that all players are afforded the highest level of care and support throughout their gambling journey. This proactive approach will not only reinforce the principles of responsible gambling but also foster a safer and more balanced gambling environment globally.

Jurisdictional Leaders

Here we highlight a few jurisdictions as examples of regions that are leading in RG programming. The three jurisdictions with the most comprehensive RG frameworks covered in this review are the United Kingdom (UK), Italy, and Ontario, Canada. Below is a summary of the RG frameworks in each of these jurisdictions, highlighting their comprehensive approach.

United Kingdom (UK)

The UK is recognized for its robust and detailed RG regulations, which emphasize player protection across all stages of the gambling journey. The UK Gambling Commission enforces stringent measures including age verification, identity checks, and mandatory pre-commitment limits on deposits and betting. The UK also mandates continuous access to RG information, ensuring that players are well-informed about the risks associated with gambling. Furthermore, the UK requires operators to offer comprehensive self-exclusion programs, which are available 24/7 and include options for both temporary and permanent exclusion. These programs are supported by strong enforcement mechanisms, including the immediate cessation of marketing communications to self-excluded individuals. Additionally, the UK places a significant emphasis on consultation with stakeholders, ensuring that gambling regulations are continuously updated to address emerging risks and challenges.

Italy

Italy's RG framework is distinguished by its detailed and systematic approach to player protection. The Italian regulations require operators to implement comprehensive identity verification processes, including the validation of age and tax codes before allowing players to

participate in gambling activities. Italy also mandates that RG resources be integrated directly into account management interfaces, making them easily accessible to players. This includes features like session limits, betting limits, and continuous updates on account balances and gambling activity. Furthermore, Italy enforces strict rules on the transparency of wagering limits and game rules, ensuring that players are fully informed before engaging in gambling. The country also requires operators to provide detailed transaction reports upon request, further enhancing transparency. Italy's self-exclusion programs are well-integrated across both online and physical gambling platforms, providing a cohesive approach to managing gambling behaviour.

Ontario, Canada

Ontario has developed a comprehensive RG framework that integrates both preventive and reactive measures. A key feature of this framework is the pre-commitment tools, which allow players to set deposit, loss, and time limits during registration, with the flexibility to adjust these limits at any time. This supports players in managing their gambling behaviours over time. The framework emphasizes player education and self-assessment tools, accessible 24/7, enabling players to evaluate their gambling habits and access RG information. This ensures that players are well-informed about risks and available support options. Additionally, Ontario mandates employee training for gambling operators, ensuring that staff receive regular instruction on recognizing problem gambling behaviours and assisting at-risk players. Ontario's self-exclusion programs offer multiple exclusion options with immediate enforcement upon a player's request. Ontario focuses on ensuring the immediate effect of self-exclusion within each platform independently, allowing players to take breaks or self-exclude as needed. The province also enforces financial transaction protocols, requiring identity verification for withdrawals to enhance security. Gambling advertisements must include RG messages, ensuring promotions encourage safe practices and do not target vulnerable individuals. Ontario remains committed to funding education programs, research, and harm reduction initiatives, with dedicated resources allocated to public education and treatment services. The framework is regularly updated through stakeholder consultations, allowing Ontario to respond to emerging challenges and maintain its focus on player protection.

In summary, the UK, Italy, and Ontario stand out for their comprehensive and well-enforced RG frameworks, which provide strong protections for players throughout their gambling experience. These jurisdictions have developed detailed regulations that not only prevent gambling-related harm but also promote a safe and transparent gambling environment.

Table 1. References for Jurisdictional Survey

Country	Region	Guideline URL
United Kingdom	England, Scotland, Wales and Northern Ireland	https://www.legislation.gov.uk/ukpga/2005/19/contents
		https://iagr.org/industry-news/loyalty-and-vip-programs-and-safer-gambling/
		https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/page/restrictions-on-withdrawing-deposit-and-deposit-winnings
		https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age/high-stakes-gambling-reform-for-the-digital-age
		https://www.gamblingcommission.gov.uk/standards/remote-gambling-and-software-technical-standards/rts-12-financial-limits
		https://commonslibrary.parliament.uk/research-briefings/cbp-7428/
Italy	Southern Europe	https://www.adm.gov.it/portale/documents/20182/1104485/Tournaments-Guidelines-for-Certification-May-19-2010.pdf/bc70ee3f-9871-17a1-e2a4-1d164297d804?t=1649515864525
		https://edn.network/gambling-regulations-in-europe/
		https://www.adm.gov.it/portale/en/-/faq-giochi
		https://merlin.obs.coe.int/article/8626
United States	Connecticut	https://portal.ct.gov/-/media/dcp/gaming/ct-sports-wagering-technical-standards-9202021.pdf
	Delaware	https://delcode.delaware.gov/title29/c048/sc01/
	Michigan	https://www.michigan.gov/-/media/Project/Websites/mgcb/Internet-Gaming-and-Fantasy-Contests/ActsandRules/Lawful-Internet-Gaming-Act-PA-152-of-2019.pdf?rev=cebcd69627d24920afe4a956175a898c#:~:text=(1)%20An%20internet%20gaming%20operator,age%20or%20Older%20and%20that
		https://casetext.com/regulation/michigan-administrative-code/departement-treasury/michigan-gaming-control-board/internet-gaming/part-5-internet-wagering-accounts/section-r-432655d-authorized-participant-account-withdrawal

	<p>https://casetext.com/regulation/michigan-administrative-code/departments-treasury/michigan-gaming-control-board/internet-sports-betting/part-5-internet-sports-betting-accounts/section-r-432755d-authorized-participant-account-withdrawal</p> <p>https://www.michigan.gov/mgcb/-/media/Project/Websites/mgcb/Internet-Gaming-and-Fantasy-Contests/Technical-Standards/20240423-Memo-LIGA-LSBA-Account-Withdrawal.pdf?rev=b9bce6753e444335b8663183422562de&hash=05CBC52067D2DB7AAC45B16C55121314</p> <p>https://www.michigan.gov/-/media/Project/Websites/mgcb/Internet-Gaming-and-Fantasy-Contests/Resources/Internet_Gaming_and_Sports_Betting_FAQs_For_Businesses_2020-10-09.pdf?rev=dd0c32d6c9714b25b09c554f2c4604c9</p>
Nevada	<p>https://gaming.nv.gov/uploadedFiles/gamingnv.gov/content/Home/Features/Regulation5A.pdf</p> <p>https://gaming.nv.gov/uploadedFiles/gamingnv.gov/content/divisions/administration/history/regulation-5-date-05-18-2017-12116.pdf</p> <p>https://gaming.nv.gov/uploadedFiles/gamingnv.gov/content/Home/Features/Regulation5A.pdf</p>
New Jersey	<p>https://www.nj.gov/lps/ge/docs/Regulations/CHAPTER690.pdf</p> <p>https://www.nj.gov/oag/ge/docs/ProposedRules/110417/finalOALnottracking.pdf</p> <p>https://www.nj.gov/oag/ge/docs/BestPractices/AdvertisingBestPractices.pdf</p>
Pennsylvania	<p>https://www.legis.state.pa.us/cfdocs/legis/li/uconsCheck.cfm?yr=2017&sessInd=0&act=42</p> <p>https://www.pacodeandbulletin.gov/Display/pacode?file=/secure/pacode/data/058/chapter814a/s814a.2.html&d=reduce</p> <p>https://www.pacodeandbulletin.gov/Display/pacode?file=/secure/pacode/data/058/chapter813a/chap813atoc.html&d=reduce</p>
Rhode Island	<p>http://webserver.rilegislature.gov/BillText/BillText23/SenateText23/S0948B.pdf</p> <p>https://www.americangaming.org/wp-content/uploads/2019/07/AGAGamingRegulatoryFactSheet_RhodeIsland-2022.pdf</p>
West Virginia	<p>https://code.wvlegislature.gov/29-22E/</p>

		https://casetext.com/regulation/west-virginia-administrative-code/agency-179-lottery-commission/title-179-legislative-rule-west-virginia-lottery/series-179-10-west-virginia-lottery-interactive-wagering-rule/section-179-10-6-interactive-gaming-system-requirements https://wvlottery.com/wp-content/uploads/2022/05/Limited-Video-Lottery-Advertising-5.19-Final-pptx.pdf
Canada	Alberta	https://aglc.ca/sites/aglc.ca/files/2024-03/24-03-28%20CTCOG%20Handbook.pdf https://playalberta.ca/terms https://www.lawsonlundell.com/assets/htmldocuments/GettingTheDealThrough.pdf
	British Columbia	https://www2.gov.bc.ca/assets/gov/sports-recreation-arts-and-culture/gambling/gambling-in-bc/stds-bclc-rg-internet-gambling.pdf https://corporate.bclc.com/what-we-do/security---compliance/security-measures.html https://www.bcbudget.gov.bc.ca/2022/sp/pdf/agency/bclc.pdf https://www2.gov.bc.ca/assets/gov/sports-recreation-arts-and-culture/gambling/gambling-in-bc/stds-advertising-marketing.pdf
	Manitoba	https://www.playnow.com/mb/resources/documents/general/playnow-player-agreement.pdf https://web2.gov.mb.ca/laws/statutes/ccsm/pdf.php?cap=1153 https://lgcamb.ca/gaming/charitable-gaming/media-bingo/#:~:text=All%20advertisements%20must%20contain%20the,community%20advertising%20laws%20and%20standards.
	New Brunswick	https://laws.gnb.ca/en/pdf/cs/G-1.5.pdf https://www.alc.ca/content/alc/en/referenced/HealthyPlayPolicy.html
	New Brunswick	https://www.alc.ca/content/alc/en/legal/terms-and-conditions.html
	Newfoundland and Labrador	https://www.assembly.nl.ca/legislation/sr/regulations/rc020001.htm#3 https://www.alc.ca/content/alc/en/legal/terms-and-conditions.html
	Nova Scotia	https://nslegislature.ca/sites/default/files/legc/statutes/gaming%20control.pdf https://www.alc.ca/content/alc/en/legal/terms-and-conditions.html

Ontario	https://www.agco.ca/book/export/html/57721
	https://www.agco.ca/responsible-gambling-0
	https://www.agco.ca/en/responsibilities-and-resources/funds-management
	https://www.ontario.ca/page/reward-points
	https://igamingontario.ca/en/player/player-faqs
	https://www.olg.ca/en/geolocation.html
	https://www.agco.ca/en/lottery-and-gaming/responsible-gambling/marketing-and-advertising
	https://www.agco.ca/en/responsibilities-and-resources/player-account-maintenance-and-transactions
	https://www.agco.ca/en/responsibilities-and-resources/identifying-and-assisting-individuals-who-may-be-experiencing-harm
	Prince Edward Island
https://www.alc.ca/content/alc/en/legal/terms-and-conditions.html	
https://www.alc.ca/content/alc/en/corporate/playwise/our-promise.html	
Quebec	https://www.espacejeux.com/en/specific-conditions-of-u
	https://gowlingwlg.com/en-ca/insights-resources/articles/2019/quebec-to-introduce-new-loyalty-program-rules
	https://societe.lotoquebec.com/dam/jcr:7117da11-4175-4c05-844a-5b9397c13abe/OPE-35-code-of-advertising-standards.pdf
Saskatchewan	https://lgsask.com/about-us/responsible-gambling
	https://publications.saskatchewan.ca/#/products/962
	https://pubsaskdev.blob.core.windows.net/pubsask-prod/archived/3148/A18-01R4.pdf

Recommendations

The commitment to RG across various jurisdictions reflects a growing recognition of the need to protect players and promote sustainable gambling practices. While significant strides have been made in embedding RG principles into regulatory frameworks and operational practices, there remain critical areas where improvement is necessary. This section explores key

recommendations for enhancing RG messaging and tools throughout the player journey, emphasizing the importance of tailored and empirically validated communication strategies. By streamlining RG messaging at the sign-up stage, adopting personalized and dynamic messaging systems, and expanding outreach through advertising and social media, operators can promote safer gambling practices and foster greater engagement with RG tools. Additionally, leveraging player-initiated contact and strengthening real-time interventions during gameplay offer critical opportunities for reinforcing responsible behaviour. Enhancing self-exclusion systems and incorporating continuous player feedback further ensure that players are supported and promote the development of a responsive and effective RG framework.

- 1. Enhance RG Messaging During Sign-Up:** Across the evidence review, jurisdictional scan, and player focus groups, it's clear that RG messaging at the sign-up stage plays a crucial role in shaping RG habits. However, many players feel overwhelmed by the large amount of RG information provided during sign-up. This indicates a need to streamline the way this information is delivered, ensuring it's concise, clear, and engaging. While strong onboarding processes, including identity verification, are important for regulatory compliance, there is an opportunity to present RG information in a more digestible way, improving player comprehension and enhancing the effectiveness of safeguards.

To this end, gambling providers can enhance player engagement by adopting interactive and user-friendly formats—such as video guides, segmented content, and interactive tutorials—that make RG information more accessible. Testing different presentation formats is essential to identify the most engaging and memorable medium for RG messaging, as diverse player preferences may influence message retention and engagement.

Additionally, refining the volume and prioritizing salient RG content such as the importance of limit setting, could help create a more streamlined experience, reduce the time required to engage with the material, and increase customer satisfaction. This approach would make RG messaging more accessible for users with limited time and attention, while maintaining the integrity and protective intent of the information.

- 2. Implement Personalized and Dynamic RG Messaging:** The evidence review demonstrated that personalized RG messaging, such as expenditure-specific pop-ups, significantly reduces gambling-related harm. Similarly, focus group participants valued tailored messages but expressed a need for variety to keep the information engaging and effective. Operators should enhance the player experience by implementing dynamic, personalized messaging

systems that adapt to player behaviour, spending limits, and gambling patterns. Tailored communication can ensure that RG messages are more relevant and effective in promoting safer gambling practices. Empirical validation of RG messages and the delivery of these messages is necessary however, to ensure that no unintended consequences arise.

- 3. Expand Advertising and Social Media Outreach:** Both the focus groups and jurisdictional scan highlighted the potential of advertising to share RG information. Participants suggested expanding RG messaging beyond gambling platforms to social media and television, as this could help normalize the use of RG tools and reduce stigma. Gambling providers should be encouraged to include RG messaging in all public-facing advertisements, particularly on digital platforms. Ensuring RG tools and information are widely available through engaging and accessible content can foster greater awareness of safe gambling practices and reduce the stigma associated with using RG tools.
- 4. Leverage Player-Initiated Contact as a Key Touchpoint:** Focus groups revealed that player-initiated contact, such as resolving account issues, is an underutilized opportunity for delivering RG messaging. While much attention is given to onboarding and gameplay touchpoints, interactions initiated by players present a significant opportunity for further engagement. Gambling providers should incorporate RG information into all customer support interactions, using these moments to offer additional support and promote RG behaviour.

Incorporating RG messaging into player-initiated contacts requires thoughtful training for customer support representatives to engage effectively and sensitively. Staff should be equipped to initiate RG discussions appropriately, obtaining the player's consent before offering additional support or guidance, thereby respecting privacy and recognizing that RG discussions may be sensitive for some individuals. Training should also emphasize situational awareness, enabling staff to discern when a player may be receptive to RG advice and when they simply want to resolve their issue quickly and move on. Many players may be busy or uninterested in additional RG information at that moment, so staff should be prepared to offer RG support only when appropriate, ensuring that interactions remain respectful of players' time and preferences. Such an approach not only improves the efficacy of RG messaging but also fosters a supportive environment that prioritizes respectful, needs-based engagement.

- 5. Strengthen Real-Time Interventions During Gameplay:** The evidence review, and jurisdictional scan, emphasize the positive RG promotion effects of real-time interventions such as session reminders and pop-up messages. These tools show promise in encouraging safer gambling behaviours by increasing players' awareness of their gambling activity. However, the evidence of their overall effectiveness is mixed with studies suggesting that

their impact varies depending on factors such as message design, timing, and player receptivity. Enhancing real-time intervention efficacy remains an important area for further exploratory research which should be designed to examine messaging strategies and modalities such as the use of visual or audio cues and mandatory breaks to better capture players' attention.

Implementing real-time interventions effectively often relies on advanced artificial intelligence (AI) tools and rich pools of player data to tailor messages to individual behaviours. These technologies enable greater precision and personalization, which may enhance engagement for some players. However, deploying such systems requires significant investment in technology and infrastructure, including the development of data analysis capabilities and adherence to privacy regulations. For smaller operators, these costs can be a substantial barrier, potentially limiting their ability to adopt these tools widely. Nonetheless, it is recommended that all operators begin to build capacity in this powerful domain.

AI-driven, data-informed real-time interventions are increasingly viewed as an important component of a comprehensive RG strategy. Some studies and player feedback from our focus group suggest that personalized, timely messaging may contribute to safer gambling habits. Operators and regulators should approach these measures with informed optimism, and explore innovative yet scalable solutions that balance cost, accessibility, and evidence-based impact.

- 6. Expand and Integrate Self-Exclusion Systems:** Self-exclusion programs are widely available and serve as an effective tool for mitigating gambling-related harm. However, there is room for improvement in terms of accessibility and integration across platforms. Focus group participants suggested that more tools and clearer information could make self-exclusion options even more user-friendly. Full integration of self-exclusion programs across both online and physical gambling environments would ensure players receive consistent support. Additionally, operators should make self-exclusion options easily accessible at all stages of the gambling journey, providing clear, immediate protections for those who need them.

To maximize the efficacy of these programs, it is crucial to establish standardized practices across all gambling operators, particularly regarding the duration of self-exclusion periods. Consistency in self-exclusion options—ensuring that players encounter the same terms and lengths of exclusion across different platforms—would enhance the clarity and predictability of support available to those seeking assistance. While the gambling treatment literature offers limited guidance on optimal abstinence periods to prevent relapse, insights from substance abuse research suggest that longer durations are likely

more effective. For instance, studies indicate that abstinence periods of three to six months, although achievable, have minimal predictive value in preventing relapse (see Nowatzki and Williams, 2002). Evidence from substance abuse research supports the need for abstinence periods of two years or more to prevent relapse in most cases (Nides et al., 1995; Vaillant, 1995), with even longer durations needed for some individuals. Thus, establishing substantial, consistent exclusion durations across operators may better support lasting behavior change among individuals at risk. Furthermore, prompt implementation of standardized, integrated systems is essential, as delays may impede timely access to protective measures. By adopting cohesive, immediate self-exclusion practices, operators can contribute to a more reliable, effective safety net for individuals at risk, fostering a more comprehensive approach to harm reduction.

- 7. Continuous Improvement Through Player Feedback:** Focus groups indicated that player feedback is essential for refining RG tools and messaging. Participants appreciated the RG information they received but emphasized the importance of variety and personalization to maintain engagement. Gambling operators should regularly gather player feedback to continuously improve RG tools and communication strategies. Encouraging the use of player surveys or focus groups will ensure that RG tools evolve to meet the changing needs of the player population, enhancing their effectiveness over time.

An ongoing commitment to gathering player feedback is essential in maintaining the efficacy and responsiveness of RG tools and messaging. By establishing continuous, structured feedback mechanisms—such as player surveys and focus groups—gambling operators can rapidly detect any unintended or adverse consequences that may arise from the implementation of new RG features. This proactive approach allows for timely adjustments to RG strategies, minimizing potential negative impacts on players and enhancing the overall responsiveness of the intervention. Regularly incorporating player insights also ensures that RG tools remain relevant and tailored to evolving player needs, further supporting sustained engagement and positive behavioral outcomes.

While the foundational elements of RG are well established across many jurisdictions, there are notable opportunities to enhance their effectiveness at crucial stages of the player journey. By streamlining RG information during sign-up, utilizing personalized and dynamic messaging, and expanding outreach through social media and advertising, gambling providers can foster greater player engagement and reduce the stigma around RG tools. Furthermore, leveraging player-initiated contact and enhancing real-time interventions during gameplay offers critical opportunities to reinforce safer gambling practices. Expanding and integrating self-exclusion systems across all platforms ensures that players receive consistent support throughout their gambling experience, while continuous feedback loops from players will allow operators to

refine and adapt RG tools to meet evolving needs. Together, these strategies create a more responsive, inclusive, and effective RG framework that promotes player well-being.

Conclusion

The global gambling ecosystem is increasingly focused on promoting RG and enhancing player protection across jurisdictions. This report emphasizes that while various strategies—such as real-time interventions, personalized messaging, and self-exclusion systems—are employed to protect players, there remains room for improvement in standardizing and refining these approaches. A key takeaway is that the effectiveness of RG measures depends heavily on their implementation, accessibility, and adaptability to individual player behaviours.

However, a key concern is that much of the empirical work necessary to verify the efficacy of these RG tools remains underdeveloped. A review of the academic literature reveals a lack of rigorous studies evaluating the long-term effectiveness of these initiatives in real-world settings. This lack of empirical validation limits the understanding of RG tools' true impact and raises concerns about the potential over-reliance on strategies that may not be as effective as intended, or worse, may have unintended negative consequences (Wohl et al., 2017).

Supporting these conclusions, Shaffer et al. (2024) recently published an article titled *"Twenty Years of Responsible Gambling: The Science-Based Glass is Half Full"*, reflecting on the evolution and impact of the Reno Model for RG. The authors critique the widespread adoption of RG initiatives without adequate empirical validation and emphasize the need for more scientifically robust evaluation metrics. Current evaluations, they argue, often rely on self-reported behaviors or short-term data, which are insufficient to fully assess the effectiveness of these programs in reducing gambling-related harm. The authors call for more rigorous, evidence-based methods to improve future assessments.

Empirical validation offers clear benefits for the development and application of RG tools in gambling environments. Data-driven research allows for refining tools to improve risk classification systems, optimize feedback mechanisms, and tailor interventions to player behaviours. Such evidence-based approaches provide a foundation for informed policymaking and ensure that regulatory strategies effectively reduce harmful gambling behaviours.

By building on existing frameworks, incorporating dynamic, engaging methods, and subjecting these tools to systematic empirical evaluation, gambling operators and regulators can create a safer gambling environment. Ongoing integration of player feedback, technological advancements, and cross-jurisdictional collaboration is essential to fostering an ecosystem that prioritizes player well-being while preserving the integrity of the gambling industry.

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