

# **GAMBLING HARM PREVENTION: STRUCTURES, RESPONSIBILITIES AND WAYS FORWARD**

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# DECLARATIONS

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# PRESENTATION OUTLINE

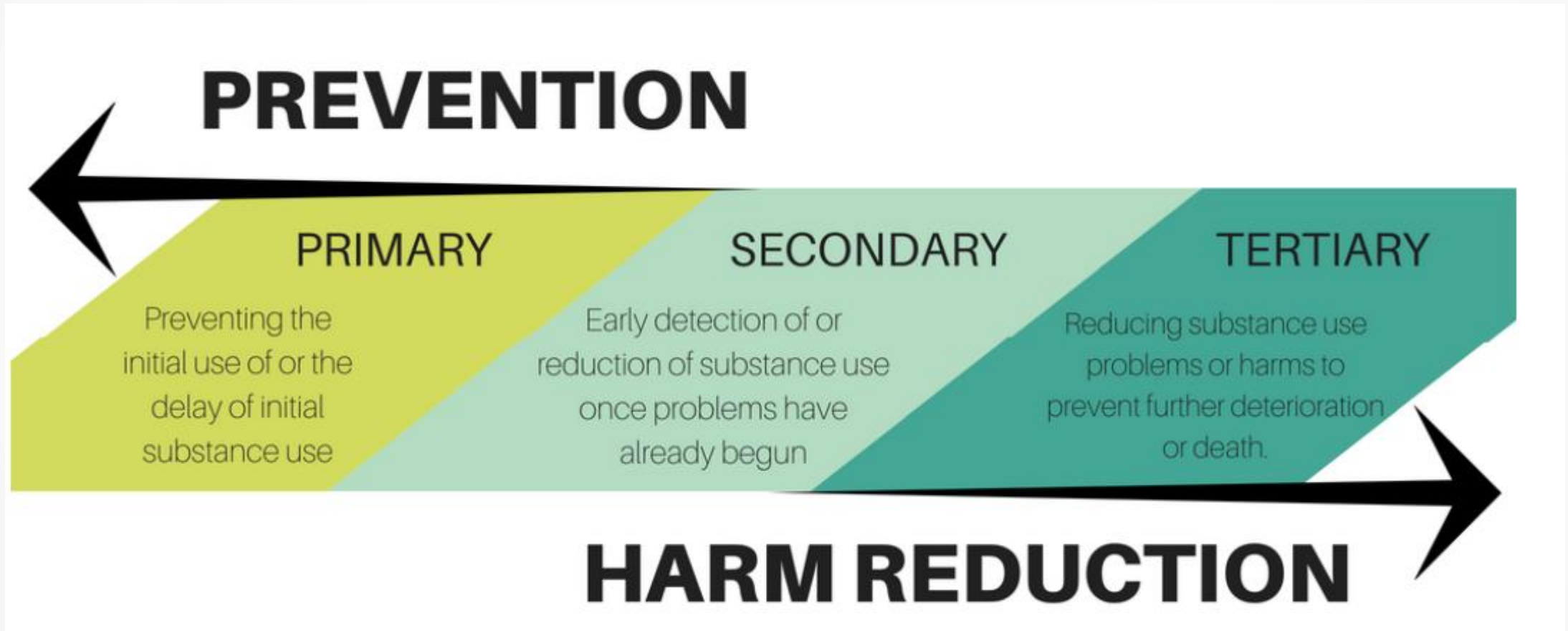
1. On harm prevention
2. Effective harm prevention measures
3. Responsibilities in harm prevention
4. Barriers for harm prevention
5. Ways forward for improved harm prevention





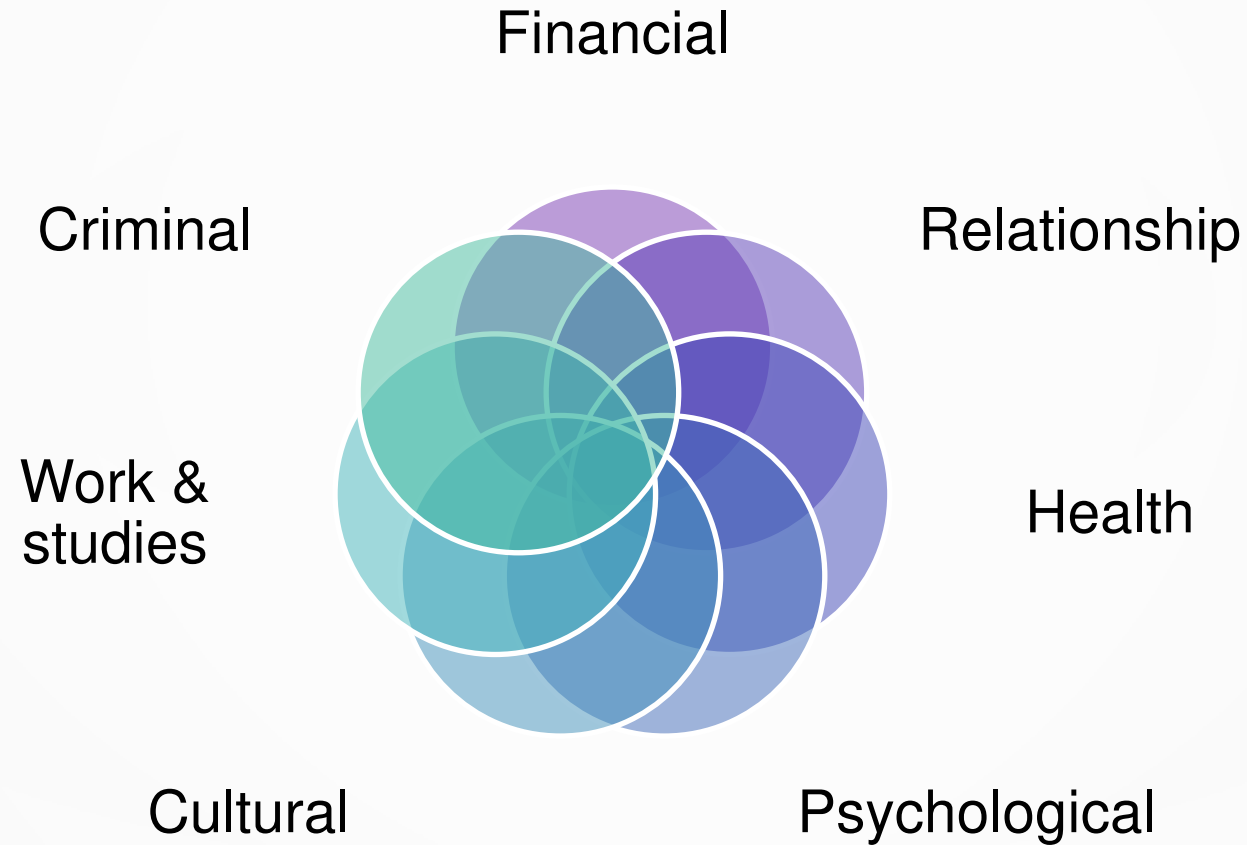


# ON HARM PREVENTION





# WHAT HARMS ARE WE PREVENTING?





# EFFECTIVE HARM PREVENTION MEASURES

## Primary (universal)

- Reducing availability
- Reducing accessibility
- Reducing visibility (including marketing)
- Limiting harmful products and characteristics

## Secondary (selective)

- Binding mandatory limits
- Warnings
- Personalised feedback
- Duty of care interventions

## Tertiary (indicated)

- Duty of care interventions
- Self-exclusions
- Effective forms of treatment: CBT, motivational interviewing



# LIMITING AVAILABILITY AND ACCESSIBILITY

- Age limits
- Opening hours (including online)
- Availability across brands
- Blocking offshore gambling provision
  - DNS and payment blocking
  - App availability, SEO
  - Limiting availability of wider ecosystem (e.g., affiliate websites)



Tämä kuva, tekijä Tuntematon tekijä, käyttöoikeus: CC BY-ND

## Best Online Casinos May 2025

Sort by **SCORE** NEW BONUS CRYPTO FREE SPINS CASHBACK NO DEPOSIT BETTING GAMES

Toplist with 468 available casino(s) for you.

1

**Simsinos Casino**

Score: Excellent 5.00/5

**1st Deposit Bonus**  
100% up to \$250**1st Deposit Spins**  
110 Spins

LICENSED IN CANADA

**PLAY**

18+ T&amp;C's Apply

2

**Kingmaker Casino**

Score: Excellent 4.97/5

**1st Deposit Bonus**  
100% up to \$500**1st Deposit Spins**  
50 Spins

LICENSED IN PHILIPPINES

**PLAY**

18+ T&amp;C's Apply

3

**BluVegas Casino**

Score: Excellent 4.94/5

**1st Deposit Bonus**  
100% up to \$500**1st Deposit Spins**  
100 Spins

LICENSED IN CANADA

**PLAY**

18+ T&amp;C's Apply

4

**Woopwin Casino**

Score: Excellent 4.91/5

**1st Deposit Bonus**  
100% up to \$400**1st Deposit Spins**  
100 Spins

LICENSED IN CANADA

**PLAY**

18+ T&amp;C's Apply

5

**Spinsy Casino**

Score: Excellent 4.88/5

**1st Deposit Bonus**  
100% up to \$500**1st Deposit Spins**  
200 Spins

LICENSED IN COMOROS

**PLAY**

18+ T&amp;C's Apply

## Table of Contents

- Best Online Casinos May 2025
- The International Online Casino Guide
  - Dedicated Local Online Casino Guides
  - How to Beat Wagering Requirements at an Online Casino
  - Step by Step guide to complete KYC at online casinos
  - Latest Launched Online Casinos – Casinos in May 2024
- Top Online Casino Sites by Category
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  - Game Studios
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  - Online Casino Platforms
- How it works: From Signup to Withdrawing Winnings
- A Casino Guide Players Trust
  - Customer Support
  - Responsible Gambling
- Online Casino FAQ
- Conclusion

**Best Australian Casinos****Best Canadian Casinos****Best European Casinos****Best Casinos Germany****Best Indian Casinos**





# REDUCING VISIBILITY

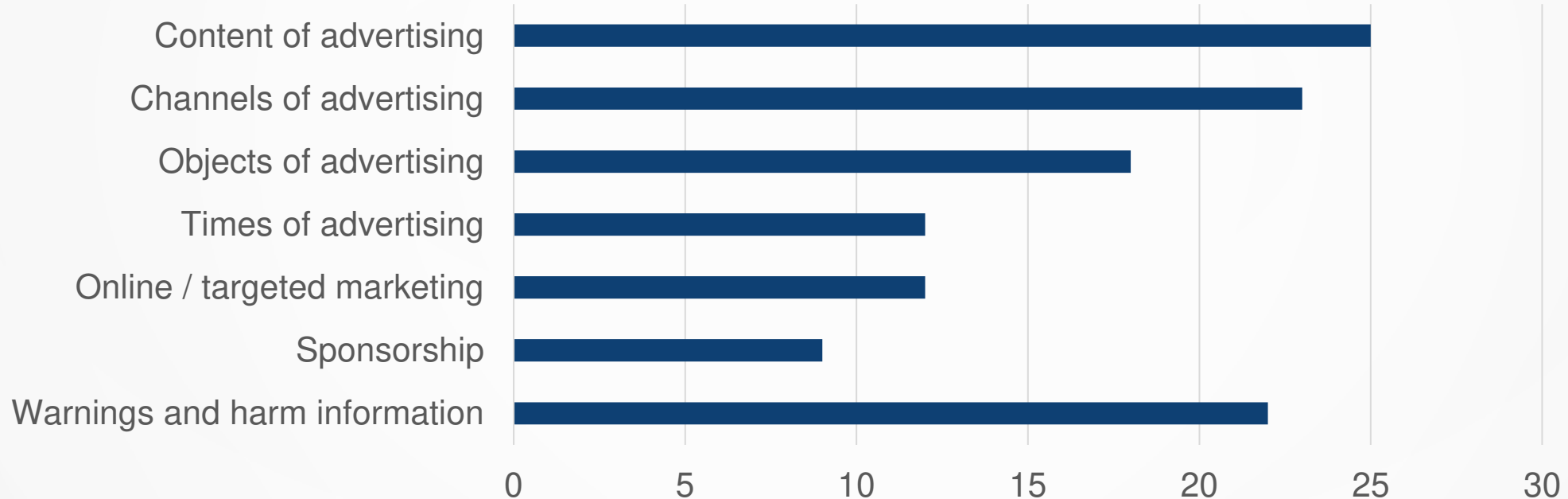
- Reducing or prohibiting marketing (also WHO)
- Untargeted marketing: recruits new customers
- Targeted marketing: particularly harmful
- Data-driven practices
- Increasingly opaque online marketing
- Alibi brand marketing (brand extensions)





# GAMBLING ADVERTISING REGULATIONS IN EUROPE (N=30)

Advertising restrictions, European countries (N=30)





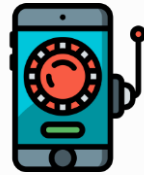
# LIMITATIONS PROPORTIONATE TO HARM



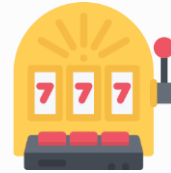
Lotteries



Online  
gambling



Online casino



EGMs



Casino



Sports betting

*Population prevalence (k=131)*

44.7%	7.8%	2.7%	11.6%	5.6%	6.9%
(42.0 - 47.4)	(6.2 - 9.5)	(2.1 - 3.4)	(9.8 - 13.5)	(4.8 - 6.5)	(6.0 - 7.8)

*PG prevalence amongst those who gamble on specific products (k=36)*

2.0%	8.6%	15.8%	8.1%	10.0%	8.9%
(1.4 - 2.7)	(6.0 - 11.5)	(10.7 - 21.6)	(5.5 - 11.1)	(6.0 - 14.7)	(5.2 - 13.5)



# NUDGES AND SLUDGES

- Nudge: encouraging certain behaviour
- Sludge: Detrimental frictions
- Dark patterns: deceptive user-interface design
  - Asymmetric dark patterns
  - Covert dark patterns
  - Deceptive dark patterns
  - Restrictive dark patterns

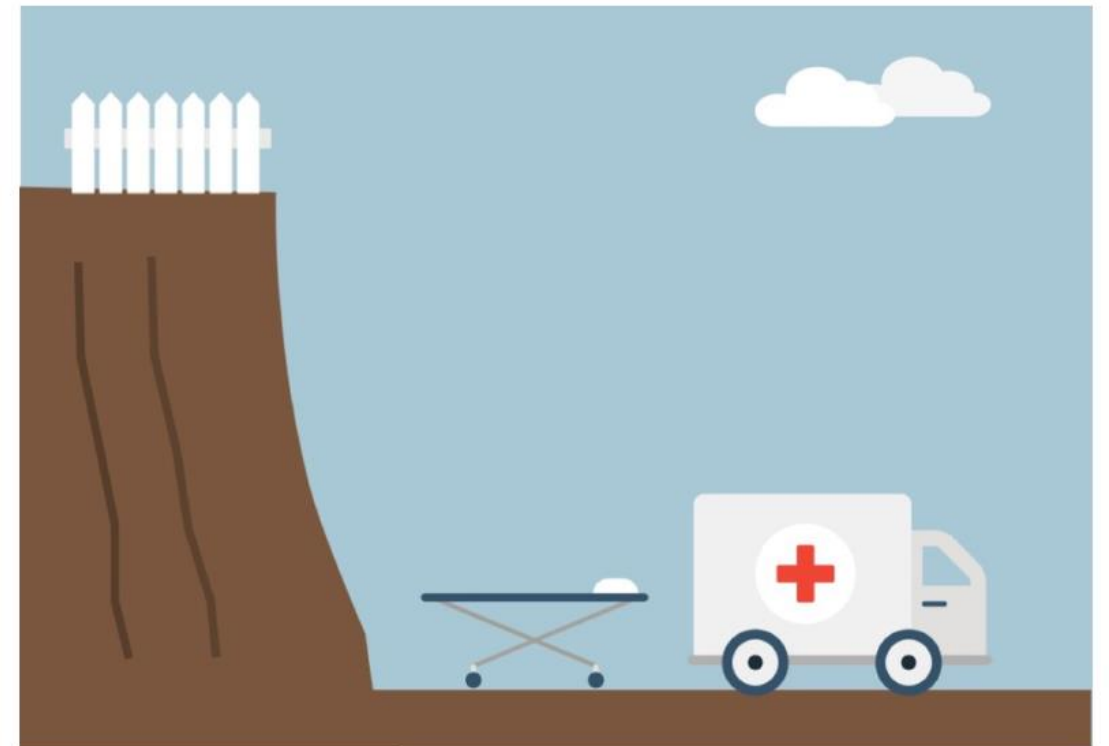






# BINDING MANDATORY LIMITS

- Binding, global and reasonable
- Spending limits, loss limits
- Limits on maximum wagers
- Time-based limits and mandatory breaks
- Reasonable baseline
  - Potential alignment with LRGG?
  - Increases with affordability checks





# DUTY OF CARE: SECONDARY OR TERTIARY PREVENTION?



## Tracking 'markers of harm'

Patterns of spend, repeat deposits, insufficient funds on account  
Time indicators, night time gambling  
Use of RG tools, customer-led contacts



## Setting predetermined thresholds to flag potentially harmful patterns



## Intervention

Messaging  
Phone call contact  
Exclusion, closing account



# RESPONSIBILITIES IN HARM PREVENTION

- Who is responsible for implementing and enforcing harm prevention measures?
  - Particularly in competitive online systems
- What kind of barriers exist for effective harm prevention?
- 10 key informant interviews in countries that have recently implemented a licensing system in online gambling
  - Sweden, the Netherlands, Germany, Ontario (Canada)
  - Thank you to my colleagues **Nina Karlsson** and **Mette Kivistö** 😊
- Focus on harm prevention in competitive markets



# RESPONSIBILITIES

Measure	Primary responsibility
Public information, awareness campaigns, research and education	Policymakers, health professionals, researchers, industry, NGOs
Restricting advertising	Policymakers, regulators, industry, NGOs
Restricting availability and product design	Policymakers
Pre-commitment strategies and self-exclusions	Policymakers, regulators, industry, individuals
Duty of care policies	Policymakers, regulators, industry
Informing about risk and signposting to support	Industry
Provision of and access to support and treatment	Policymakers, individuals, health professionals, NGOs
Proactive interventions	Industry, regulators





# **”EVERYONE HAS TO DO SOMETHING”**

- Policymakers set the framework for harm prevention
- Regulators issue further guidance
- Industry should comply and follow regulations
- Regulators enforce and monitor
- NGOs and researchers can nudge for reforms
- Individuals use the tools that are provided and are receptive to interventions

Who has overall responsibility?



# BARRIERS TO HARM PREVENTION



Competing interests



Industry power



Lack of resources



Lack of centralisation and cooperation



Offshore operations

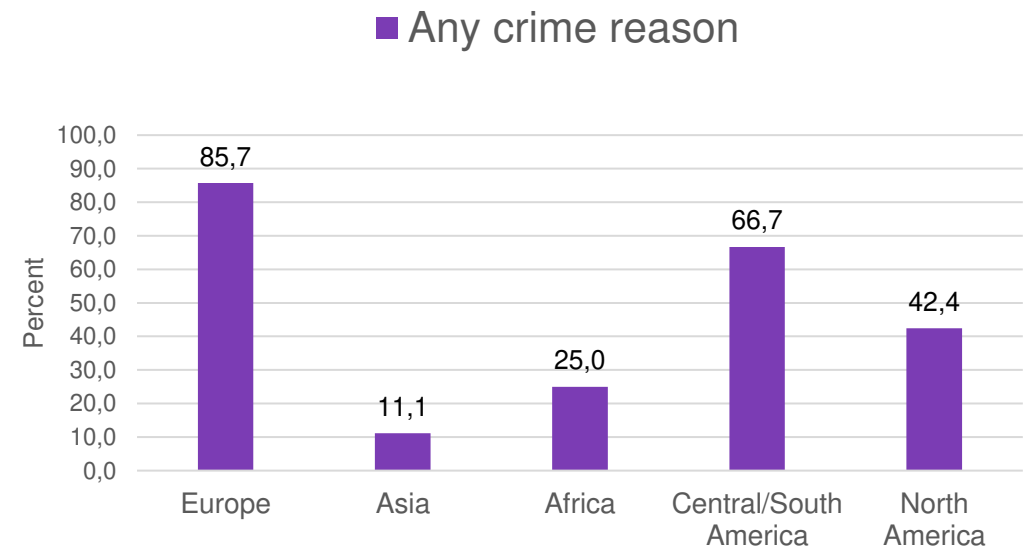
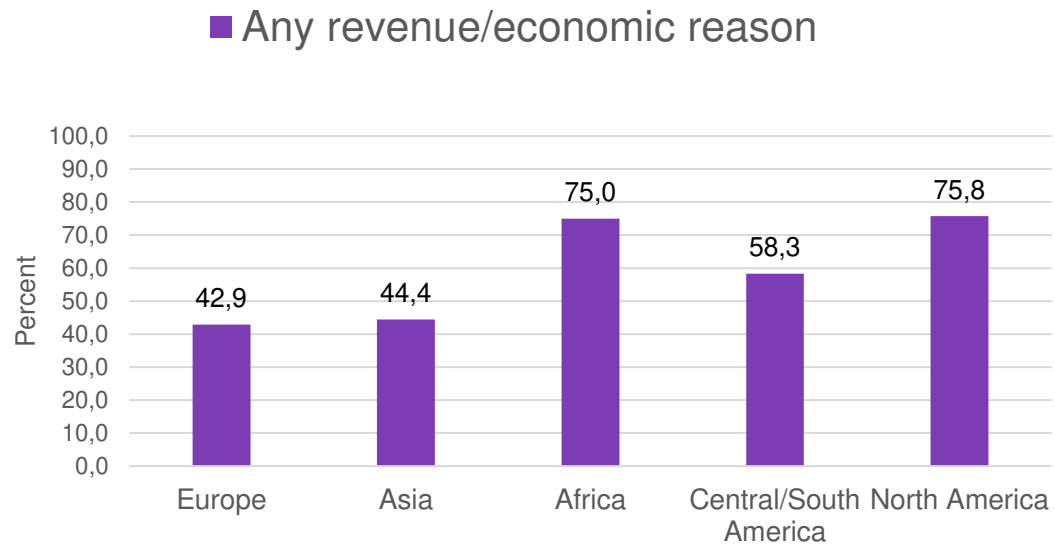
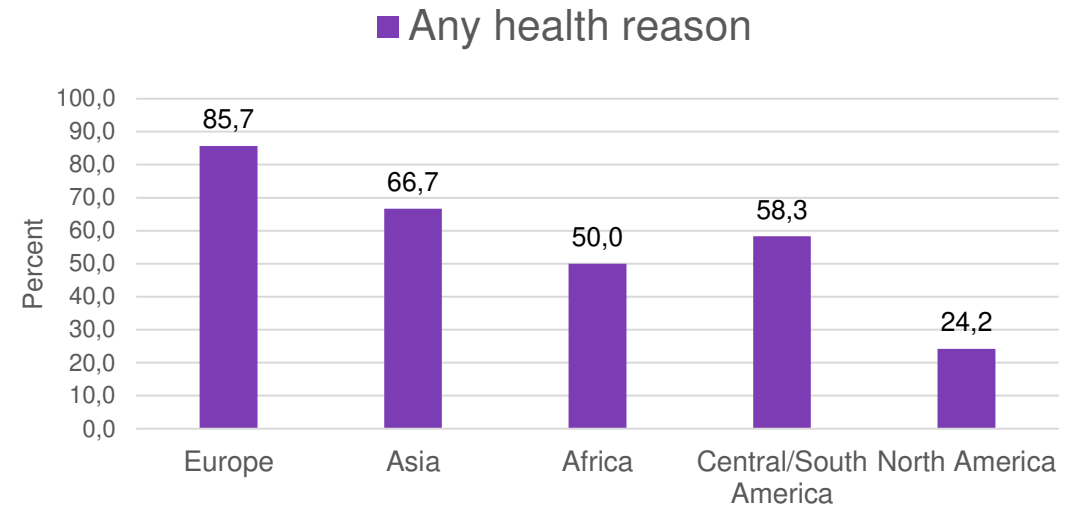
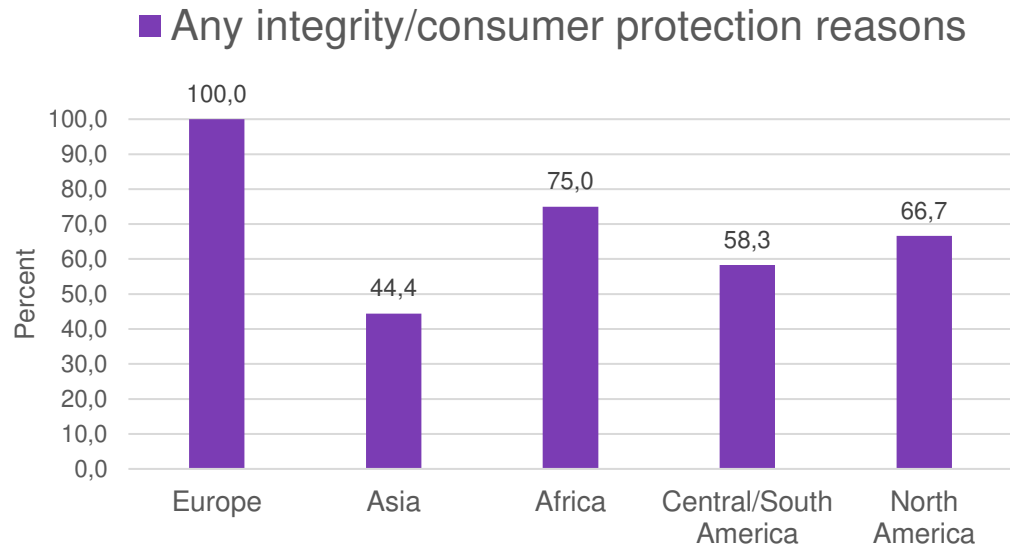


# 1. COMPETING INTERESTS

- Harm prevention and profit are contradictory objectives
  - Effective harm prevention will negatively impact profit
- Smaller companies may have even stronger conflicting interests

*“The majority of the companies that have a license in Sweden, they don't have the manpower, and they don't have the real will. They're trying to survive in a very competitive market where there's another 80 online casinos available. If they start limiting their MVPs [most valuable players], they're out of business. That's that simple.” (Sweden, NGO)*

- Inherent contradictions also in legislation







	Limiting harm and/or consumption	Security, legality and crime prevention	Financial reasons
Denmark			
Alcohol	n/a		
Gambling	X	X	
Finland			
Alcohol	X		
Gambling	X	X	
Iceland			
Alcohol	X		
Gambling	X	X	X
Norway			
Alcohol	X		
Gambling	X	X	X
Sweden			
Alcohol	X		
Gambling	X	X	X



## 2. INDUSTRY POWER

- Power in framing societal perceptions of gambling
- Power over regulators – regulatory capture
- Lobbying for industry-friendly regulations and promotion of self-regulation

*“Well, I mean, the challenges are that we end up or retain a landscape where people are guided by industry discourse and lobbying... to remain in a situation where **ineffective measures are promoted** and where you have the famous story about the emperor with the new clothes, and everybody's afraid to say that he's actually naked. To a large degree, that's what's happening in the Netherlands.” (NL researcher)*



## Product and system design

Design of gambling products, including structural characteristics, that make products more harmful

Deployment of online choice architecture and dark patterns techniques to influence behaviours.

Development of boundary-spanning products (eg, social casino games, daily fantasy sports etc); and cross selling of gambling products

## Commercial practices and partnerships

Direct and indirect marketing, advertising, and promotion, drawing on data surveillance for profiling and targeting

Widespread partnerships and sponsorships with sporting, media, charitable and benevolent, and financial organisations, creating a complex commercial ecosystem with vested interest in commercial gambling expansion

Use of social media and influencer promotions to promote brands and products that normalises gambling



## Shaping politics and regulatory agendas

Lobbying of policy makers, regulators, and decision makers, including funding political campaigns

Shaping the evidence base by controlling research funding and agendas, and access to data, while undermining legitimate science and research

Resisting regulatory change, presenting industry as a legitimate stakeholder in the policy and decision-making process

## Shaping public perception

Framing gambling as harmless leisure and emphasising the industry's role in wealth creation, employment, and revenue generation

Associating sole responsibility for harms with the shortcomings of individuals and not a consequence of commercial products, practices, and policies

Promoting corporate social responsibility and related policies that focus on the individual and to deflect attention away from commercial practices



### 3. LACK OF RESOURCES

- Lack of resources for regulation, harm prevention, research
- Difficulty in remaining proactive
- Even monitoring duties cannot be properly performed with existing resources

*“[The companies] have estimated that the chance of getting caught in this net is small.” (SE researcher).*





## 4. LACK OF CENTRALISATION AND COOPERATION

- Need for more international collaboration between regulators
- Need for cross-operator monitoring of harms
  - Centralised precommitment
  - Centralised duty of care

*So, what we see quite often, [...] we say, ‘well we lower your limit because we're a bit worried about your behaviour.’ Very often we don't see these players afterwards. I'm not really sure that they've actually stopped playing. More likely it is that they just moved to another operator.” (NL industry)*



## 5. OFFSHORE GAMBLING

- Licensing systems have not solved the offshore problem
- Offshore gambling undermines effective harm prevention

*“Internet is Internet and, regardless, if you cancel every opportunity to transfer money, you can always do this on the dark web. There will always be opportunities, you can use the VPN or whatever. But you need to have that [...] in the public mind or so to speak that you should go to the licensed.” (SE researcher)*



# WAYS FORWARD?

## Balancing existing asymmetries

- Asymmetry of power between industry and other actors
- Asymmetry of responsibilities (conflicting responsibilities)
- Asymmetry between harm prevention and harm reduction

## Offshore trope

- What is the empirical relationship between harm prevention and offshore gambling?

## Collaboration!

- EU-level regulation, World Health Assembly
- Cross-sectoral collaboration -> understanding emerging patterns
- Collaboration in data collection and research\*



**KIITOS, TAKK, THANK YOU!**

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