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# CAMH recommendations on internet gambling in Ontario

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Centre de toxicomanie et de santé mentale

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Collaborating Centre

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University of Toronto

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## Introduction

In August of 2010, the Ontario Lottery and Gaming Corporation (OLG) announced plans to have a “socially responsible and secure” online gambling program in place in Ontario by 2012. The OLG is conducting consultations prior to the launch of government-operated/regulated internet gambling, and CAMH is pleased to participate in this process.

CAMH is Canada’s largest mental health and addiction teaching hospital, as well as one of the world’s leading research centres in the area of addiction and mental health. CAMH combines clinical care, research, education, policy development, and health promotion to transform the lives of people affected by mental health and addiction issues. CAMH’s Problem Gambling Institute of Ontario (PGIO) brings treatment professionals and leading researchers together with experts in communicating and sharing knowledge. Its focus is on collaboratively developing, modelling and sharing evidence-based solutions to gambling-related problems within Ontario and around the world.

The recommendations in this document flow from empirical evidence, the knowledge of clinicians and health promoters at CAMH and in the community, and the experiences of CAMH clients and their families. Section 1 is a statement of CAMH’s position, focusing on general concerns and recommendations. Section 2 is composed of our responses to specific OLG questions around responsible gaming tools and platform elements being considered for internet gambling in Ontario.

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# SECTION 1

## Concerns

Many individuals in Ontario gamble, and most do so responsibly. However, 3.4% of Ontarians exhibit evidence of a gambling problem, and the resulting individual and social costs are significant (Smith, 2009).

Unregulated internet gambling is widely available to Ontarians. The OLG seeks to offer Ontarians a legal alternative, regulated by the AGCO, in order to tap into potential revenues currently lost to illegal and unregulated operations.

There are several concerns about potential impacts of the introduction of government-operated/regulated internet gambling in Ontario. Some of these relate to consumer protection and privacy issues, areas in which CAMH has very limited expertise. This paper will focus on the contribution of internet gaming to the prevalence and acuity of problem gambling, and the related impacts for individuals, families, and communities.

It has been suggested that with the introduction of legal, accessible online gambling options, **the provincial prevalence of problem gambling may increase, and/or existing gambling problems may be exacerbated for certain individuals.** There are several reasons for these concerns (Griffiths, 2003).

- The removal of legal deterrence to gambling online means that, compared to the current internet gambling options, individuals will have significantly increased access to online gambling platforms that are legal and considered trustworthy from a consumer protection standpoint. Evidence suggests that the *increased availability and access of legal gambling venues* results in a net increase in gambling, with some individuals who are affected by problem gambling also likely to gamble more.
- The relative *anonymity* that characterizes online activities allows individuals to gamble without fear of stigma, and possibly also under the influence of alcohol or drugs.
- The *isolation* inherent in internet activity makes it easier to gamble for long periods, and to experience feelings of dissociation which may in turn affect gambling behaviour.
- Research suggests that when gambling online, individuals become less inhibited and tend to have a *decreased perception of the value of money*. Since internet gambling offers easier access to credit and/or virtual cash, harm may result.
- The *advertising* of new gambling platforms and jackpots is believed to contribute to increases in the prevalence of problem gambling.
- Youth may be particularly vulnerable to developing gambling problems, as well as to the allure of internet gambling (Griffiths, Derevensky, and Parke forthcoming). This is particularly important given that problem gambling among youth is associated with mental health and substance use problems as well as other problematic or criminal behaviour (Cook et al., 2010).

Available evidence suggests that individuals who gamble online are more likely to have gambling problems than those who gamble exclusively at land-based venues, so caution is warranted (Wood & Williams, 2007). With the implementation of the “best practices” outlined below, government-operated/regulated internet gambling can be implemented in a way that mitigates harm.

## Recommendations

It has been stated that “the most effective [internet gambling] regulatory schemes share common elements that bear a close resemblance to those offered in highly-regulated land-based gambling operations” (Wiebe & Lipton, 2009). Indeed, the first set of recommendations we are making in this document are extensions of existing regulations in place at land-based OLG gambling venues. The following measures are widely considered to be essential elements of an effective regulatory scheme for socially responsible internet gambling (Griffiths, 2003; Griffiths, Derevensky, and Parke, forthcoming; Smith, 2009; Sparrow, 2009; Wiebe & Lipton, 2008; Wood & Williams, 2007).

1. *Use of cutting-edge age verification techniques.* This will ensure that minors do not access the OLG’s internet gambling sites.
2. *Provision of information for individuals who gamble.* This is a crucial part of any regulatory scheme seeking to mitigate the harms associated with problem gambling. In particular, all government-operated/regulated internet gambling sites should provide accessible, prominently placed information about responsible gambling and the risks of the game, as well as access to self-diagnostic tools on problem gambling and access to help agencies and help lines that provide prevention and treatment services.
3. *Implementation of controls over advertising and promotion.* It is imperative that when designing advertising and promotion of new internet-based OLG products, care be taken not to target or appeal to youth. In addition, advertising should not be misleading, and all advertising should be accompanied by information on responsible gambling.

The second set of recommendations is specific to internet gambling, and seeks to address issues that may arise due to increased availability and accessibility of gambling opportunities, the anonymity and isolation associated with internet use, and the decreased value of money that occurs when individuals gamble online.

Experts have suggested several *technical controls regulating access and use* that, together, may help mitigate the risks associated with internet gambling. There is a consensus in the literature on online gambling that the following measures are necessary components of a regulatory scheme for socially responsible gambling (Griffiths, 2003; Griffiths, Derevensky, and Parke, forthcoming; Sparrow, 2009; Wiebe & Lipton, 2008; Wood & Williams, 2007).<sup>1</sup>

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<sup>1</sup> See McCormick 2007 for a broad overview.

1. *Limits on credit/deposits, losses, and session time* should be set for account holders. These limits can be per session or per day, and one option is to allow individuals to select their own limits. Session time and monetary balance should be prominently displayed.
2. Games should involve betting of *actual dollar amounts* rather than points.
3. Individuals must have the opportunity to *self-exclude*, and the self-exclusion process should be easy to navigate and rigorously enforced. Individuals should have the option of self-excluding from internet gambling alone, with self-exclusion from casinos being a distinct process. There should also be a prominently featured “panic button” that allows individuals to immediately self-exclude for a period of 48 hours, and leads them to information about responsible gambling and treatment services.
4. There should be *built-in pauses between games*, in order to give individuals the opportunity to reflect on whether they would like to continue or withdraw. Similarly, bettors should be given the opportunity to confirm or cancel bets they have just placed.
5. After games, there should be *no encouragement to re-gamble*; that is, to re-invest money won or “chase” losses. Individuals should have the option of cashing out at any time, and the process should be simple.
6. *Practice games, if offered, should be accompanied by the same precautions as those involving gambling for real money*; in addition, the odds of winning and rates of return must be an accurate representation of actual play.

## Conclusion

There is a risk that the introduction of government-operated/regulated internet gambling could result in an increase in the provincial prevalence of problem gambling, or an exacerbation of gambling problems for some individuals. The adoption of the recommendations outlined above would be consistent with the OLG’s goal of ensuring that its internet gambling program is socially responsible. We urge the OLG to adopt these measures, and to ensure that the efficacy of the internet gambling regulatory framework, including these harm mitigation strategies, be regularly evaluated by a third party.

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# SECTION 2

## 1. Explanation and Promotion of Responsible Gaming (RG) Tools for Online Gambling

### 1.1 General Requirements

#### OLG Policy Question 1:

Do you have suggestions for effectively capturing players' interest?

We understand that while many players will benefit from the protective features suggested in this suite of tools, it is vital that RG features be tailored to players who may be at various levels of harmful involvement. Our clinical experience with clients demonstrates that being an “informed player” may reduce the likelihood of developing gambling problems for certain types of customers. For those who seek counselling; however, corrective information about the games is simply inadequate in preventing chasing, losses and other harmful gambling behaviours. Equal – if not greater – emphasis should be directed to ensuring obvious indicators of problem gambling are addressed, such as extended play, erratic betting and chasing behaviours. While providing accurate information about gaming may be effective in helping some players understand the games and set more realistic parameters for their involvement, good information alone will not enable many people with gambling problems to control their gambling.

The policy questions identified in this section refer primarily to technical approaches and evidence-informed practices. Our position is that OLG should adopt evidence-informed practices and make a strong commitment to researching these approaches to determine their effectiveness in the local context. We support the use of appropriately sized pop-up messaging and selectively targeted messaging that focuses on the specific and unique risks of the various games. We believe that time and money limits and restrictions on the number of games allowed should be used to promote responsible play. Mandatory “timeouts” and player-initiated exclusion should also be available.

The RG platform should primarily support players in making informed choices about gambling by providing relevant information, tools, and other resources in language that matches the lexicon used by each primary player group to help inform such choices. In addition, OLG must consider more targeted and nuanced measures for chasing, erratic bets and extended play, and should proactively implement these features to protect customers who are not able to control their gambling.

The PGIO supports the use of pop-up and other messaging that is of significant size so that it can compete with all of the other stimuli on screen. See explanation in Question 2 for details.

### OLG Policy Question 2:

What type of message delivery (i.e. static, pop-up, dynamic) and content would be most effective to support this direction?

In general, evidence indicates that dynamic (i.e. pop-up) messages are more likely to be noticed, read, and recalled than static messages by gamblers (Monaghan, 2008; Monaghan, 2009) and internet users alike (Stark, 1990). Evidence indicates the following about pop-up messages:

- They deliver information effectively, improve user comprehension and application of information, and influence thoughts and behaviours (Monaghan, 2008)
- They are more favourably received when cognitive effort is low (e.g. during breaks) and when seen as relevant, interesting, and useful (Monaghan, 2008)
- Messages promoting self-awareness of current behaviour (e.g. *Do you know how long you've been playing? Do you need a break?*) Encourage players to monitor and appropriately modify their gambling behaviour (Monaghan, 2008)
- To capture player attention and successfully convey information, they should be “*appropriately sized (e.g. 75% of screen), with clearly worded messages in large font (e.g. No smaller than 16) and appropriate colours (e.g. Black text on white background), with a bold red border to indicate the warning nature of the message*” (Monaghan, 2008)

## 1.2 Play Management

### OLG Policy Question 1:

Do you have advice on how OLG might modify generic RG tools to suit specific games?

Lengthier games like poker can involve more time investment from players so “time loss,” rather than money loss, appears to be a greater concern for this particular group (Monaghan, 2008). Conversely, games involving more frequent betting (e.g. slots, VLTs) may primarily create issues around money losses (Monaghan, 2008). Perhaps particular emphasis regarding the value of such tools could be selectively targeted toward players based on their game of choice.

### OLG Policy Question 2:

Do you have advice on options for limits on cash expenditure that will not deter or alienate internet players?

It should be acknowledged that it will be necessary to set limits on cash expenditures in order to support responsible gaming, even if this means that there is some impact on profit. It is difficult to say what those limits should be however and issues such as high-risk patterns of play should also be considered.

### OLG Policy Question 3:

Can you provide suggestions as to how OLG should manage the number of games that can be played at a given time?

Looking across games, the best predictor of whether someone is an internet problem gambler is “gambling on a greater number of formats” (Monaghan, 2008), so some restrictions on the number of games allowed would logically have strong protective functions. Looking within games, with regard to poker, player performance (as estimated by monthly winnings) may actually increase when one plays 3-4 tables, but drops dramatically beyond that (Monaghan, 2008). In general then, it may be worth limiting the number of games one could play simultaneously, while also explicitly indicating to players that they could probably expect performance (i.e. winnings) to decrease when they play several games at once.

### OLG Policy Question 4:

Should consideration be given to “timeouts” from play? Do you have any recommendations for potential parameters, for example, mandatory or voluntary timeout, intervals for occurrence, player chooses desired length and option to ignore?

Using mandatory “timeouts” during play can be highly effective in managing problem play (Monaghan, 2008; Monaghan, 2009). This type of break, if presented to players hourly along with an RG message regarding amount of time and money spent, has the potential to: reduce time disorientation, briefly draw attention away from play and toward self-assessment of time and money invested (relative to one’s original intentions), as well as encourage the player to address their immediate physical needs (bathroom breaks, hunger, tension, etc). Regarding the duration of such a break, there could be a default setting (e.g. 5-10 minutes) with the option for players to set it higher if preferred. Similarly, in the event that players prefer more frequent timeouts, there could be an option to lower the time limit (e.g. 30 minutes) while keeping the 60-minute interval mandatory (with no option to ignore it however).

### OLG Policy Question 5:

At what point/under what criteria might OLG consider involuntarily excluding a player?

Ideally, any exclusion that takes place should be player initiated and follow from self-awareness that a concern exists. The intent of the RG platform is to support players to make their own choices about gambling and provide relevant information, tools, and other resources to help inform such choices. At the same time, OLG must recognize that some players will be unable to make informed choice and should proactively respond to indicators of problem gambling.

## 2. Time Limit Setting

In our work with problem gambling clients and clinicians across the province, we have been aware of the historic problem of unaddressed extended play in land-based venues. The online environment makes this type of extended play a greater worry still, given the complete privacy in which a customer can gamble. This privacy also enables people to make bets while intoxicated, and our clinical experience supports this as a legitimate concern.

The online environment has an advantage over land-based venues in that limits can be set and reinforced electronically, without any of the potential for conflict and upset that occurs when trying to “cut off” someone in person. In short, this format is ideal for introducing and enforcing realistic limits. Given players with problems are usually unable to adhere to these voluntarily, or through “willpower,” the OLG is in an ideal situation to “pull the plug” when reasonable time limits have been reached.

We support the use of mandatory self-set time limits to assist players in managing their gambling. It is important to recognize that some types of play involve much longer periods of time and time limits may be tailored to the specific games. Further research is required to inform OLG on the specific times to provide pop-up warnings.

We support personal responsibility and therefore believe it is best to honour a player’s previous decision regarding a break in play. Problem gamblers do find play breaks to be useful and there is some support for having players wait 48 hours before amending earlier decisions.

### OLG Policy Question 1:

Can you provide advice to guide parameters on options for session limits versus advance limits?

We support the *requirement* for players to set time limits in advance. Research shows that many gamblers do not choose time limits if they are voluntary, despite the value these limits have in ameliorating the effects of heavy gambling.

### OLG Policy Question 2:

At what intervals should warning messages (i.e., “time limit is almost up”) be displayed?

As previously noted, one approach would be to present an initial pop-up warning at 15 minutes, another at 5 minutes, and then at 1 minute before the limit is reached. A final pop-up could simply inform the player that their limit has been reached and that, *as requested*, gambling will be prevented for the remainder of the time period.

### OLG Policy Question 3:

What are your views on whether the system should shut down automatically, or if player should have the option to choose a “yes or “no” option from a pop-up window?

In keeping with expert opinion that operators encourage both personal responsibility and informed player choices in their RG policies and platforms (Reith, 2009; Blaszczynski et al., 2005), it would likely be best to simply honour a player’s previous decision. Allowing an opt-out at that point could also eliminate the opportunity to reflectively assess choices and manage behaviour within *self-prescribed* limits.

### OLG Policy Question 4:

Are you aware of any safeguards available to prevent software malfunction of the “stop play” function?

This question is beyond our area of expertise. With respect to the overall approach however, it is equally important to consider time *and* money limits.

### OLG Policy Question 5:

What varying lengths of cooling-off periods should be considered?

For example, *Svenka Spel* has cooling-off periods that can last up to one month.

While uptake of “play break” features are generally quite low (2-5%) (FRC, 2007; IPC, 2008), problem gamblers in particular do find them useful (IPC, 2008), and most other gamblers indicate an interest in having this option available (RGC, 2009). While most gamblers appear likely choose shorter breaks (i.e. 12, 24, 48 hours) (McDonnell-Phillips, 2005; FRC, 2005), the option to choose longer periods (e.g. 1 week to 1 month) certainly seems advisable. Pre-commitment features like this can help players to manage self-identified “high-risk” situations or periods when money may need to be directed elsewhere (e.g. holiday season, tax time, etc). Finally, it appears that the majority of players (75%) would likely abide by such decisions and not visit other sites during such breaks (IPC, 2008).

### OLG Policy Question 6:

Are there any reasonable courses of action players could take to re-set limit and reinstate play if they want to amend a previous decision?

With regard to “reasonable” steps for players who wish to revise advance limits, there is some support for having players wait 48 hours before amending earlier decisions (Wood, 2010). This is also the current practice at *Espace Jeux*.

### OLG Policy Question 7:

If there are claims that a limit was set in error, should there be options to correct this and avoid the cooling-off period?

In the case of players claiming mistakes in setting their limits, a period of at least 48 hours seems like a reasonable delay before revision is possible. That said, one approach to addressing “mistakes” would be to allow players a single opportunity, early on, to revise their time limit settings without significant delay (e.g. after 12 hours).

### 3. Monetary Limit Setting

Our experience shows that problem gambling clients usually spend every dollar they have when they go to a land-based casino, and sometimes try and find other resources to use to recoup their losses. The OLG online gambling site will have the potential to address this problem more proactively, for the same reasons as outlined in #2.

Evidence suggests that financial tools are popular and are typically perceived as being quite useful. Our clinical experience overwhelmingly shows that financial losses are a primary reason for seeking help. There is also evidence of strong support among some gamblers for a mandatory break before being allowed to reset spending limits. Financial tools should be an important component of the RG platform.

#### OLG Policy Question 1:

If a limit is set, how long should the time period be before the player can re-set limit?

For example, with *Svenka Spel*, limits can be re-set but won't be implemented until the following week.

Among online gamblers who use or are considering using RG features, financial tools like account statements and self-set money limits are the most popular and are typically perceived as being quite useful (Griffiths et al., 2009; RGC, 2009; eCOGRA, 2007). With regard to setting session and longer-term deposit and loss limits, other RG-focused sites typically require 48 hours to 1 week before allowing players to reset their limits. As indicated earlier, regardless of the length of time chosen, having the same cooling off period for money and time limits could help players to weight these costs equally.

#### OLG Policy Question 2:

Should limits reflect expenditure from the amount initially deposited only, or include a “total loss” that includes additional winnings (churn)?

There is some risk of players becoming confused about their gambling expenditures if deposit and/or loss limits include winnings. Having said that, players often have a poor understanding of the amount of money they have lost while gambling. People with gambling problems discount even very large wins that they subsequently reinvest and lose. This presents a problem. Wins should be tallied and simply presented to players so that it is clear how much of their winnings have been re-invested and what are their total losses. This system does not need to be complicated and should not be misleading.

#### OLG Policy Question 3:

How often/at what intervals would these messages be displayed?

Messages and displays regarding gambling expenditure should generally follow the same approach outlined previously in Section 1 (General Requirements) and Section 2 (Time Limit Setting).

#### OLG Policy Question 4:

How should options for messages be delivered (i.e. placement, timing, language)?

Messages and displays regarding gambling expenditure should generally follow the same approach outlined previously in Section 1 (General Requirements) and Section 2 (Time Limit Setting).

#### OLG Policy Question 5:

What other criteria or advice should be available for cash limit messages?

In general, messages should aim to convey to players that gambling (like other forms of entertainment) generally costs money and, while players can *hope* to win additional money, they should not *expect* to come out ahead.

#### OLG Policy Question 6:

Can you provide advice as to what an appropriate maximum deposit/wallet limit should be? For example, maximum deposit/wallet limit in B.C. is \$9,999 per week.

It is beyond our expertise to comment on the exact dollar figure for maximum deposit/wallet limits. However, based on our clinical expertise, B.C.'s limit of \$9,999 causes concern and we recommend an amount that is significantly lower. In an ideal world of internet gambling, it would be more effective to set maximum deposit limits based on the customer's economic situation, such as income. However, this is not possible. According to Woods (2010) in his report for Loto Québec, "a fixed mandatory spend limit will always be too little for some players and too much for others."

#### OLG Policy Question 7:

Do you have suggestions as to what kind of criteria should guide a maximum limit?

Other than what is already being suggested (i.e. consider how much you can afford/are willing to lose), the evidence does not identify any applicable guidelines for such decisions.

#### OLG Policy Question 8:

Considering the range of player preferences and needs, what consideration should be given to impact that maximum limits will have on decision-making by individual gamblers with different profiles (i.e. some gamblers can afford to lose more than others)?

Other than what is already being suggested (i.e. consider how much you can afford/are willing to lose), the evidence does not identify any applicable guidelines for such decisions.

### OLG Policy Question 9:

At what intervals would warning messages (i.e. “cash limit is almost up”) be displayed?

Because wager amounts and the frequency of betting varies considerably across players and games, using a remaining dollar amount to determine warning intervals would have limited value (e.g. you now have \$20 left, you now have \$10 left, etc.). It could make sense however for warnings about an approaching limit to be based on the *proportional* amount of money remaining. For example, an initial pop-up warning might announce to a player that “You’ve now reached 50% of your chosen spending limit”, after which the same warning is repeated when larger proportional amounts have been reached (e.g. 80%, 90%, and 95%). These types of pop-up messages are an effective way to make players aware of their current-session spending and have been shown to reduce the frequency of excessive spending in high-risk gamblers (FRC, 2007).

### OLG Policy Question 10:

Once play is stopped, do you have recommendations as to how long the “stop duration” should be? In the case of *Svenka Spel*, once a limit is reached, the account cannot be filled – and play cannot be resumed – for one week

There is evidence of majority support among some gamblers that there be a mandatory break before being allowed to reset spending limits and that these be relatively brief (e.g. 24-48 hours) (McDonnell-Phillips, 2005). Current practice at other RG-focused sites appears to be 48 hours to 1 week of stop-duration but, as pointed out earlier, cooling-off periods for money and time limit resets should probably be consistent.

## 4. Self Assessment and Data Analysis

CAMH recognizes that while many players gamble socially and set limits, people with problems who eventually self-exclude or seek treatment, have usually lost the ability to accurately self-assess their behaviours and respond accordingly. The huge number of Ontarians who have used self-exclusion as a last resort speaks to this lack of control for people who develop problems. Self-assessment tools cannot be developed with the presumption that all players are the same, or that all players have the capacity to accurately assess their gambling. Extra protections need to be built in for this group of people. Informational approaches and soft measures should not be over-relied on for people who have multiple problem gambling red flags.

Players rate self-assessments as being among the most useful RG features available. Self-assessment should be strongly promoted as part of a suite of easy-to-use RG tools, not only for people who may have a gambling problem but for any player who would like some feedback on their gambling. The evidence about incentives is less clear but should not encourage further spending and should be used to encourage players to subscribe to RG features. While recognizing that players should be able to make choices about their own gambling, this premise should not be used to completely abdicate

responsibility on the part of OLG in indentifying, and in some cases intervening, with gamblers who are clearly demonstrating problem behaviours, such as chasing, playing for extended periods without breaks or attempting to change their loss limits.

#### OLG Policy Question 1:

How can the operator promote and encourage player participation in self-test?

Specifically, how can the operator effectively target low-risk and moderate-risk players?

Research suggests these groups are most likely to use these tools, and most likely to benefit from them.

From the most recent surveys of online gamblers, players rate self-assessment tests as being among the most useful RG features available (second only to spending limits and regular financial statements) (eCOGRA, 2007; Griffiths et al., 2009). These tests can be an effective way to improve player awareness of their gambling relative to other's, and whether they need to consider changes. Providing resource/referral information to players following the test also seems like a sensible idea. With regard to encouraging players to utilize self-assessment tools, it might make sense to simply promote them as part of a suite of RG features shown to enhance players' sense of self-control (which also improves their enjoyment of the games) (OBR, 2007). Perhaps more importantly, from the player's perspective, RG features appear to support players in minimizing losses. Compared to non-subscribers, those using these tools have been found to have: 1) higher average winnings; 2) greater amounts of money cashed out during play; and 3) kept a higher percentage of their initial deposits overall (FRC, 2007), suggesting that RG feature users get greater play value than non-users. Other considerations might include providing tutorials for their use and generally ensuring that players perceive the RG tools as being both simple to use and relatively unobtrusive.

#### OLG Policy Question 2:

Is providing incentives an effective way of encouraging participation?

If so, what type of incentive might be appropriate?

There is some debate about offering incentives to players for using RG features but there is a consensus that, if incentives are used, they should generally not encourage further spending (RGC, 2009). That said, internet gamblers (particularly poker and casino game players) put "available bonuses" ahead of all other features when rating sites, since it gives them more time to gamble, slightly reduces the house's edge (thereby increasing potential player profit), and appeals to a sense that they're "getting something for nothing" (eCOGRA, 2007). It would appear that offering some type of play bonus for initially subscribing to RG features could increase participation rates. Other (non-monetary) options that have been tried include: free lotto games to RG feature subscribers, offers to automatically deposit lotto winnings into players' bank accounts (e.g. "Never miss a win" in Sweden and Norway), and offers to make a charitable donation (from a list of charities) on behalf of subscribers. Continuing incentives for players who subscribe to new RG features might encourage ongoing use and awareness of these tools as well. The optimal time to offer incentives for using RG tools would seem to be at registration, for two reasons: 1) the sooner these tools are initiated, the

greater the degree of accuracy and player safety provided since baseline data is established for later comparisons; and 2) a good portion of regular players (48%) who try out these features *continue* to use them (FRC, 2007) and report satisfaction with their use. (Griffiths et al., 2009).

### OLG Policy Question 3:

How can the operator foster public trust that self-assessment data will be kept private and confidential? What is the best way to communicate this to players?

### OLG Policy Question 4:

What is the best way to address player privacy concerns? Some players may perceive “Big Brother” intentions behind RG tools.

### OLG Policy Question 5:

What tactics could help overcome these perceptions? How could the operator help promote the use of RG tools among players?

A general approach to reassuring players that their information remains private and confidential is to reinforce the notion that, regardless of any RG messages received as a result of using these features, control over decisions about gambling and help-seeking remains with the player. The operator’s role in that regard is to provide relevant and supportive information that facilitates players making informed choices about their gambling, and offering proactive responses where appropriate. Keeping the onus on players to initiate contact with supportive resources, while making it as simple as possible to do so from the site, suggests a generally “hands-off” approach but also indicates support from the operator. Also, ceasing promotional send-outs when gamblers appear to be having problems is another way of indicating that player safety (as opposed to potential profit) is of utmost importance to the operator. Finally, players should be given the option to opt out of any promotional contact lists.

## 5. Real-Time Feedback

In our clinical programs, we see that players with problems generally do not have a sense of appropriate time or financial limits, and put very little forethought into these decisions. An important addition to this feature might be an information display, available in various languages, to help players decide how much to play.

Current session feedback is a potentially powerful but relatively new RG feature that brings with it some potential risks. There are concerns for example, that real-time feedback could inadvertently encourage some players to chase losses and that this may be more likely to occur among problem gamblers. Risk ratings and other features should be explored; however, the significant impact to the field could be made by including a robust research effort to accompany implementation of these features.

### OLG Policy Question 1:

While the “traffic light” image is useful for communications, it may have limitations, (e.g. profiles of players identified as “green” could change to yellow or red over short periods of time, depending on changes in their play habits). How can the operator address this variability, while communicating feedback clearly?

Current session feedback typically provides players with a real-time running total of time and money spent during an active session. Presumably, the value of this feature is to help offset players’ tendency to underestimate their involvement in current gambling. However, this type of feature is still relatively new and warrants further research to determine its efficacy especially given that one study found that gamblers actually spent 3x more time and 7x more money than they estimated. We recommend a real time feedback feature that includes an evaluation component to determine its efficacy. It is noteworthy that another study suggests this feature may be more popular with problem gamblers but a majority of users (60%) ultimately utilized the feature.

An interesting visual aid such as a “traffic light” or “risk meter” could be useful, or potentially confusing, depending on: a) what the player’s actions are being measured against; and b) when/how often the visual cue is presented. Another concern is that real-time feedback could inadvertently encourage some players to gamble longer or spend more money in an effort to recover their posted losses (i.e. chasing). This has not been demonstrated however and, in any event, online gamblers generally indicate a preference for “light-touch” RG tools like this (eCOGRA, 2007).

### OLG Policy Question 2:

What approach should be taken with respect to messages (e.g. intervals and points in play display of message, type of message)?

The most obvious times to present feedback messages would be during mandated and/or voluntary timeouts and at the end of each session. Given that intervals between feedback messages could be an hour or so under a mandated timeout strategy, shorter intervals (i.e. 30 minutes or less) should be considered as there is some empirical support for presenting messages more frequently (FRC, 2007). In terms of presentation, dynamic approaches like pop-ups (as outlined under General Requirements, Part A) or possibly even streaming messages could be considered.

### OLG Policy Question 3:

What kind of criteria should be considered to determine the point where marketing efforts are modified or stopped?

It seems advisable that, when a player registers “red”, they should stop receiving promotional material from the site operator, perhaps until a significant change in their risk level (i.e. “green”) has been reached.

#### OLG Policy Question 4:

Can you provide examples of technologies you believe may be effective?

In what ways are they effective?

The best current example of this type of technology appears to be the rating system within Svenska Spel's Playscan feature. This system, which assesses risk based on player history (along with an optional self-test), is managed by the operator as follows:

*“For players receiving a yellow or red light, Svenska Spel offers a number of services. They can deliver one of 55 to 60 computerized messages that are tailored to the gamblers' situation and risk level, provide a helpline number, ask players if they would like someone to call them and direct players to an online chat group. The more Playscan deems a player to be at-risk, the more messages that player will receive.” (RGC, 2009)*

In Australia, players have a number of options provided, including an email providing help-seeking assistance and the option of receiving a call from a counsellor. CAMH recommends that customers who are at a demonstrated level of high risk should be given the option of receiving a call from a counsellor. In addition, they should be given information about sources of help that they could act on themselves – information about the Ontario Problem Gambling Helpline, resources at the PGIO website, etc. This type of operator response would be commendable. It is worth noting that, in a recent survey of Playscan users, 9 out of 10 users reported that their rating had remained “green” since initiating the feature (Griffiths et al., 2009). Among the remaining 11% with ratings that had changed to “yellow” or “red”, 44% reported having reduced their gambling in response to this feedback (IPC, 2008). This suggests that RG features like the Playscan colour rating system, at least as it's currently designed, is not confusing at all to users and indeed was rated to be “quite useful” or “very useful” by 50% of Playscan respondents.

## 6. Voluntary Breaks

Our experience with gambling clients and feedback from clinicians across the province overwhelmingly indicates that problem players play for extended periods without breaks. Again, the online format is ideal to require players to take reasonable breaks, at designated times, and without any difficulties one might experience in a land-based venue. This suggests that short-term play breaks and long-term self-exclusion are two important tools to assist online gamblers and should be included as part of a suite of RG tools. These would allow the player to block themselves from accessing the site for a specified length of time. This should immediately trigger a stop of all promotional materials from being sent to that player and trigger a referral option. We support player choice in this regard, along with the provision of resources to allow them to be successful and proactive mechanisms in place to respond to extreme play patterns.

### OLG Policy Question 1:

How should the operator differentiate/promote “short term breaks” features from “voluntary self-exclusion”-type breaks when presenting/communicating these to players?

There is support for the notion that short-term (i.e. play breaks) and long-term (i.e. self-exclusion) blocking be promoted and accessed in distinct ways for players (Wood, 2010). While both options simply prevent a player from gambling on the site for a given period of time, they actually appear at different points on the harm reduction continuum, have quite distinct purposes, and are generally targeted at different types of gamblers. Ideally, players would be encouraged to view the “play break” tools as: a) being of potential benefit to *all* players; and b) intended for ongoing use (i.e. prevention/early intervention). Self-exclusion features, on the other hand, would typically fall at the other end of the spectrum (i.e. later stage intervention/abstinence) in that they would generally be aimed at managing a serious gambling concern, utilized much less frequently, and typically follow earlier attempts at self-management. It is important to note however that, across ALL gambler types, there is strong support for having these features in place (RGC, 2009).

As a general promotional strategy, it could make sense to promote time-limit tools as being part of an overall concern for “player safety” and to remind players that, while nobody *plans* to develop a gambling problem, with regard to such tools its “better to have them and not need them, than to need them and not have them”. Finally, it is recommended that the operator cease marketing and promotional communication to players on ANY voluntary break, short or long-term.

### OLG Policy Question 2:

What “lessons learned” from experience with land-based self-exclusion could inform internet breaks?

Recent data indicate that up to 90% of casino self excluders (Hayer & Meyer, 2010a; Tremblay et al., 2008) and 70% of self-excluding online players (Hayer & Meyer, 2010b; Braverman & Shaffer, 2010) meet criteria for probable pathological gambling. Online gamblers appear to have more varied motives for self-exclusion as well (Hayer & Meyer, 2010b). While self-exclusion appears to be of primary interest to problem gamblers, the current proposal still ensures this option is available to any player, at any time, and for any reason.

There appears to be expert consensus that self-exclusion programs should generally offer support to players with gambling concerns and provide them with choices related to their self-exclusion decision (CAMH, 2010; RGC, 2009; Wood, 2010). Other considerations for a self-exclusion program would be: a) that success be measured by the degree to which it reduces the frequency, intensity and length of an individual’s gambling (RGC, 2009); and b) that the process actually facilitate the player’s sense of personal responsibility, dignity, and available support. Specifically, suggestions for the online self-exclusion program include:

- allowing some self-exclusion processes to be completed online (more convenient and less intimidating than phone or in-person requirements);
- keeping the online exclusion process as simple and informative as possible for players;
- allowing players to choose varying lengths of self-exclusion, starting around 6 months and going up to 5 years;
- making it easy for self-exclusion gamblers, throughout this process, to access various resources (as outlined under [EXTERNAL LINKS](#))

## 7. Payment Policy

### OLG Policy Question 1:

As electronic payment (i.e. use of credit card) is the most feasible form of collecting payment, what strategies and tactics should the operator implement to help promote responsible use of credit in this context?

### OLG Policy Question 2:

Should other methods of electronic payment be considered (i.e. interact and online bill payment)?

### OLG Policy Question 3:

Recognizing that the operator has no role in the issuance of credit cards or monitoring limits, what parameters might help frame operator's policy around the use of credit?

CAMH has seen that most of our clients over the years have maxed out multiple credit cards while gambling. Our clinical evidence suggests that using multiple credit cards, as well as repeated credit card rejection, are signs that someone is playing beyond their means. In line with this experience, research should be undertaken by OLG to determine an appropriate number of credit cards that may be used by any one player, before they are denied credit as an RG measure.

Technical questions about methods of payment are beyond our area of expertise; however, we have attempted to respond based on the existing literature. There are some concerns regarding a "credit card only" policy of payment. This brings obvious risks because players are not using their own money, may not realize how much they have charged to their cards, and may be stuck with high interest rates on outstanding debt. In any case, whichever method is used, it must be able to effectively exclude any person under 18 years of age. There is support for the idea of allowing debit card and/or online bill payment directly linked to a player's bank account (Wood, 2010) and there are several reasons for considering this option over credit cards (see details below). Players should also be allowed to withdraw money from their player accounts and deposit it into their bank accounts (see details below). In general, it seems advisable that players not only be allowed but also *encouraged* to use bank accounts for their online gambling transactions.

There are some concerns regarding a “credit card only” policy of payment. First, and perhaps foremost, is that it will lead to some players spending money they don’t have. Second, while credit cards would have an initial pre-set limit on them, those limits could be easily increased if a player requested or provided approval for such action. Third, sole reliance on a credit card to purchase games online could lead to some players being largely unaware of their spending, at least until their statements arrive at months end. Fourth, there are additional risks (i.e. high interest rates and subsequent spiralling debt) associated with utilization of credit cards. Fifth, we see players take out multiple credit cards with low limits, which are easily approved. The result is players can have up to dozens of cards, all maxed out. Finally, in situations where players accumulate significant gambling losses that are financed on their credit card, they may also experience serious consequences related to an associated negative impact on their credit rating.

Regarding the use of credit cards, experts have stressed that: “The procedures for registering an account for Internet gambling are rigorous enough to categorically determine the identity of the applicant. The procedure must be able to effectively exclude any person under 18 years of age” (Wood, 2010). Specifically, it is suggested that registration include both age and identity verification procedures, that an email and physical address be required for notification and final account confirmation, and that these processes be regularly tested. The registration procedures currently in effect at Espace Jeux are an excellent example of such efforts.

There is support for the idea of allowing debit card and/or online bill payment directly linked to a player’s bank account (Wood, 2010) and there are several reasons for considering this option over credit cards. First, there is reduced risk of players spending money they simply don’t have due to the “limit” of one’s bank account being inherently more obvious. Second, even when overdraft protection or a loan facility is available on a bank account, the interest rates are likely to be lower than those found on most credit cards. Finally, the ability to use a bank account could provide an additional safeguard to players in that the bank is more likely to have a closer relationship and/or direct contact with the player (versus the credit card company) and therefore is more likely to identify and personally intervene when there are concerns regarding account activities and increasing debt.

Taking the matter one step further, and in keeping with the operator’s stated commitment to RG, it seems advisable to also allow players to withdraw money from their player accounts and deposit it into their bank accounts. This option would effectively allow players to remove winnings or previous deposit amounts which, upon further reflection, they deem as too great to risk on gambling. This type of feature is rarely offered but certainly seems in keeping with a proposed “industry-leading” RG platform.

In general then, it seems advisable that players not only be allowed but also encouraged to use bank accounts for their online gambling transactions.

## 8. Marketing

CAMH has a long history of interacting with players who have self-excluded and have continued to receive marketing materials. This reflects poorly on OLG, and more importantly, has caused these Ontarians to feel deliberately enticed by the casinos that were aware of their problem. It is often triggering, and always unacceptable, for people who self-exclude to receive marketing materials weeks and months after taking that important step. The online environment should be connected directly to the marketing environment to ensure this does not occur.

CAMH also supports the marketing commitments made in the OLG Code of Conduct, including efforts to ensure no marketing is targeted toward youth.

On the subject of payout rates, our experience shows that inflated payout rates on demo sites can cause erroneous errors for people and contribute to problem gambling. Any deceptive marketing needs to be avoided altogether as it creates mistrust among players about the operator and can create erroneous beliefs about the chances of winning. As such, payouts on practice or demo sites should be exactly the same as they are on the actual site.

### OLG Policy Question 1:

What are some of the concerns/risks for:

- The ways in which “gray market” operators currently market internet gaming; and
- The use of social media to market internet gaming( i.e. facebook and MySpace)

### OLG Policy Question 2:

Do you have advice on how new platforms could be explored to market internet gaming and RG, for example, online discussion boards, social media (i.e. facebook and MySpace)?

A review of some gray market site practices can indeed provide instruction on “what NOT to do”. For instance, one study compared practice period (i.e. non-monetary) payout rates to those observed during actual play at 117 gambling sites and concluded, in no uncertain terms, that “internet operators use inflated payout rates and erroneous information during the “demo” period in order to attract individuals to their sites” (Sevigny et al., 2005).

Recent interviews with online poker players have led some researchers to conclude that:

*“The presence of adequate responsible gaming measures appears to increase the level of trust that some players have for an operator, making it more likely that they will play with an operator who has a prominent responsible gaming policy than with one who does not. Furthermore, visible responsible gaming measures allow the conscientious player to feel good about winning and can therefore add to the overall enjoyment of their gaming experience. These findings therefore emphasise the benefits to all parties in developing a genuine concern for player well-being.”*  
(Wood & Griffiths, 2008)

All of this suggests that an RG feature marketing strategy highlighting: 1) improved player safety; 2) potential performance benefits; 3) ease of use; 4) alignment with recognizable and trusted organizations/brands; and 5) a commitment to continual improvement, could be appealing to gamblers looking to play at (and become loyal to) a trustworthy and socially responsible site. Recent research suggests that, among online gamblers, “general reputation of the website” is the most common reason cited for choosing one gambling site over another (Wood & Williams, 2007). Assuming that other factors important to online gamblers (i.e. speedy payouts, technical reliability and competence, policing unfair player practices) (Wood & Griffiths, 2008) AND the perceived entertainment value offered were approximately equal to that found on other sites, the distinction of being “a safe bet” among the many unregulated and unscrupulous sites on the internet could provide the operator with the competitive advantage it seeks.

An excellent empirically-based review of responsible advertising and marketing of gambling (particularly as it pertains to youth) is available (Monaghan et al., 2008). Within it, the following guidelines have already been provided:

- Gambling advertisements should not be permitted to be shown during television and radio timeslots primarily accessed by children or adolescents or advertised where they may be frequently viewed by youth, including on billboards, on public transport, and in print publications where a prominent proportion of readership are minors.
- Given the influence of point-of-sale advertising on children and adolescents, it is recommended that these advertisements be restricted from display in all stores entered by minors.
- Companies and trusts that principally generate their revenue from gambling should be banned from promoting or advertising their name or products, including naming rights, branding, and logos through the sponsorship of sporting teams and events.
- Products promoting gambling or gaming companies should not be manufactured in child sizes, be available for purchase by minors, or be given away in promotions or as prizes.
- Gambling corporations should be restricted from utilising product endorsements from individuals who are likely to appeal to youth and increase the likelihood of youth gambling involvement.
- Advertisement for both gambling and practice Web sites should be subject to the same regulations described for advertisement of gambling products. In addition, free or practice sites should be prohibited from containing advertisements and direct links to online gambling sites and should have the same payout rates as their actual gambling site.
- Online and wireless gambling companies should be prohibited from advertising via SMS alerts to mobile phones.
- Advertisements for gambling products must contain accurate information regarding the chances of winning and a visible warning statement that highlights the potential risks associated with excessive gambling.

- Gambling advertisements should not be allowed to include images or sounds of excessive spending.
- Youth-oriented graphics, including animals and cartoons, music, celebrity promoters, and youth themes such as board games, and being cool, should not be used to market or advertise gambling products.
- Gambling advertisements should not include or depict any individual who is or appears to be under the age of 25, to prevent youth from relating to individuals gambling or winning.
- Regulations for gambling advertisements should be mandatory, enforced, and continually evaluated by an independent regulatory body (Monaghan et al., 2008)

## 9. External Links

### OLG Policy Question 1:

Do you have advice or suggestions for: (a) promoting external organizations; (b) facilitating their services; and (c) building partnerships with them?

The PGIO at CAMH is preparing to relaunch a self-help website for people with gambling concerns. This initiative is consistent with PGIO/CAMH's mandate to provide education and training to Ontario's problem gambling treatment providers, and will support players and concerned others about gambling and to provide a variety of options for not only self-help, but treatment.

We unequivocally endorse the OLG commitment to link to external problem gambling expert bodies and to provide multilingual services. OLG is advised to ensure that these sites are professionally sponsored, and monitored, by problem gambling specialists. Providing online forums without expert support is insufficient to respond to the expected increase in gambling problems concomitant with promotion of online gambling.

All of the proposals to facilitate player access to supportive resources are commendable and indicate an interest in player safety.

The provision of a link to GamTalk seems particularly worthwhile since these types of online forums have been shown to be an effective and popular way for gamblers and concerned others to educate themselves and find support around the issue of problem gambling (Cooper, 2004; Wood & Wood, 2009). It's also been pointed out that "the high level of anonymity and availability provided by such services allows people to easily ask questions and get support" (Wood, 2010).

Having brief descriptions of these external resources provided on the site could facilitate player selection of links that appear most appropriate to their particular needs and interests.

It could be worth looking into the possibility of using player IP addresses to help identify community resources nearest to them. Provision of the helpline number could be especially helpful to some players, including: a) those dealing with a combined internet use/online gambling problem; b) those that may currently be fed up with online experiences; and c) those that would simply prefer to hear another human voice when sharing their concerns.

The offer to provide Betstopper for free to *any* Ontario resident is commendable, and in keeping with the practice of other provinces like B.C. and N.S. Not only will it allow parents to block their children from accessing gambling sites, it also has the potential to assist some problem gamblers from doing the same. For example, if a significant other had sole administrator rights over the settings, a problem gambling partner could be blocked from both regulated and unregulated gambling sites.

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