"Regulation and addiction: strategies, challenges and views"

Workshop on Tuesday 22 November 2016

The session starts at 9 a.m.

Morning introduction

Introducing the session we have **Charles COPPOLANI, President of the French Online Gambling Regulatory Authority, ARJEL**, who welcomes the presence of Senator François TRUCY who played the decisive role that everyone knows here in the development and passage of the law of 12 May 2010.

The last prevalence survey conducted by the Gambling Observatory and the National Institute of Prevention and Education for Health (INPES) revealed a worrying situation: 200 000 players are affected by addiction and almost a million have a strong risk of becoming so in the short or medium term. If the first figure was stable compared to the last survey in 2010, the second has more than doubled.

In this context, ARJEL considers more than ever that player protection and the fight against excessive gambling is a top priority in the common interest of all stakeholders in the sector, whether they are operators, political actors or decision makers. Gaming must remain a recreational and playful activity just like a sport or a cultural excursion. However, addiction, a public health challenge, tarnishes its attractiveness. To answer this, not only does ARJEL accompany and monitor the licensed operators in the application of their responsible gambling policy, it also participates in the definition of the offer and the development of systems and prevention measures.

Thanks to the collected data, it has a comprehensive vision of the market for online games and as such can follow the evolution of gaming behaviours. Since 2010, the regulations protect excessive gamblers, minors and self-excluded gamblers more from the risks of problematic gaming, but their implementation is a daily challenge for those implementing control.

Charles COPPOLANI recalls that the gambling sector has been experiencing dramatic changes since 2010 both in terms of offer, due to technological innovations multiplying gaming potential, and in terms of the expectations of players, as fans of video games and social games. The growing attractiveness of the illegal offer resulting from this represents a real danger, which is why the scope of the regulated offer must evolve to distract players from the prohibited offer. Some casino and skill games that are currently banned in France could be authorized after a risk assessment and the establishment of efficient monitoring systems of player practice to detect immediately, or early, any signs of problematic gambling. To do this, ARJEL calls licensed operators to put forward proposals for new responsible games to the extent where they know both the market and the regulations.

Finally, Charles COPPOLANI shows how much he relies on the world of research, which he is committed to supporting, in order to identify and propose the most effective systems in terms of detection and prevention.

Regulation of the offer: how to conciliate player protection and economic interests?

The first panel of the morning, hosted by **Clément MARTIN-SAINT-LEON, Head of Economic Affairs, Prospective and Player Protection at ARJEL,** covered the theme of balancing the economic challenges of the online gaming industry and consumer protection. This balance must be ensured for each of the three regulatory models that currently coexist in France, namely the opening to competition, monopolies or even prohibition.

Hélène GISSEROT, Honorary Public Prosecutor at the Court of Audit and Chairman of the Advisory Commission of gaming and betting under exclusive rights (COJEX) (2011-2016) recalls that her term in COJEX was preceded by the one she exercised in COJER (Responsible and Controlled Gambling Committee), established in 2006. The difference between these two organisations is the scope of their expertise: whereas COJER missions were limited to the 'Française des Jeu' [holder of the monopoly on lottery games and land-based sports betting] and the promotion of responsible gaming, those of COJEX were extended to the 'Pari Mutuel Urbain' (PMU) [holder of the monopoly on land-based horse races betting] and the fight against money laundering.

Although COJEX only works with these two operators, Hélène GISSEROT emphasises the importance of economic and societal issues at stake as a result of the high number of players affected: 26 million in the Française des Jeux and 9 million in the PMU. She also highlights the sensitivity of the regulatory mission attributed to COJEX which opinions strive to reconcile two imperatives, on the one hand, risk prevention for problematic gaming through prevalence studies conducted by the Gaming Observatory, on the other hand, the reasonable and controlled development of operators.

From this point of view, COJEX has focused on three approaches in drawing up its opinions.

First of all, driven by the belief that player protection requires strong stakeholder involvement, the COJEX has sought to establish a constructive dialogue with the operators. If the Française des Jeux was already aware of the risks of addiction gambling entails , the PMU has long considered that horse races betting included a share of expertise reducing the risk of compulsive gambling, a theory invalidated by the studies of the Gaming Observatory.

Once the operators were informed, COJEX initiated with them a process of reflection in order to incorporate two dimensions in their "Responsible Gambling" plan:

- reducing the risks by prompting operators to carry out, from the conception of the games, preliminary studies in order to limit the new offer to the least addictive games possible. In this context, the Française des Jeux has made an application process in three phases for launching a game on the market: this includes a phase of experimentation, the conduct of a behavioural study of the players whose results are shared with the regulator, and finally the development of a sustainable version of the game. COJEX emphasises additionally the importance of the payback percentage and the prizes tables' supervision to prevent risks;

- promoting a culture of responsible sale within the two companies implementing training programmes, namely in the form of *eLearning* for the employees and business partners. For retailers, the Française des Jeux has also implemented a variable compensation system according to the level of inclusion of the "Responsible Gambling" plan, with an emphasis on the implementation of the ban of sales to minors ("responsible gambling" bonus). So far the PMU has not engaged itself in such a way.

Secondly, COJEX engaged in keeping operators within the context of extensive and recreational gaming,

Regarding this, COJEX has paid close attention to risks of potential intensification of the gaming practice of consumers. It invited the Française des Jeux:

- to gradually remove the game *Rapido,* which risks are proven, from its offer , without jeopardising the company of which it was the main source of revenue, and to replace it by the game *Amigo* authorised until 2020, the time to evaluate game related behaviours;
- to stabilise in its offer the scratch games sold between 5 and 10 € identified as high risk games; likewise, it expressed reservations on adjustments of horse races betting offered by the PMU which were aiming towards an intensification of the regular punters game.

However, it came out in favour of a broadening of the pool of players, either by the offer of new attractive games, or by an expansion of the commercial network which is eroding in its traditional form, to new unconventional outlets subject to appropriate training and remuneration for new sellers.

Finally, with a view to preserve the potential vectors of growth linked to the evolution of techniques, COJEX examined favourably the digitalisation strategy regarding the activity and the offer despite the risk of intensification of the game. It nevertheless invited operators to take advantage of the use of new media sets (tablets, mobile, etc.) to promote responsible gambling by gathering information about players' behaviours and by disclosing their identity.

Juan ESPINOSA GARCIA, Deputy General Director for Gambling Regulation at the Spanish Directorate General for Gambling Regulation, Minister of the Interior and Public Administration, explains that the Spanish legislation is designed to maintain a catalogue of games that is as broad as possible. Certainly some games carry a risk of addiction but an approved extensive offer enables to better protect players. The risk is inherent to gambling and betting, and the scope of the offer must be adjusted to the need to protect problem gamblers and minors. In 2011, when the extent of the offer was legally authorised in Spain, the regulation was intended to:

- Fight more effectively against fraud, corruption, terrorism and money laundering;
- Strengthen the protection of vulnerable players (minors, those prohibited from gambling, etc.) and players in general;
- Collect revenue for the state through the taxation of games.

As in any sector of the economy, the digitalisation of the offer complicates its control whatever instruments are used. The legislature must continually ensure that regulations protect the player. Without being too intrusive, public authorities have a role to play in this as some games induce greater risks than others. However, Juan ESPINOSA GARCIA believes that the balance is hard to find to the extent that, no matter the severity of the law, if the legal offer does not meet the whole demand, this is transferred to the illegal offer. When Spain designed its regulations, the slot machines offer was limited and bets were subjected to strict control. With the share of illegal gambling having reached 50% of the sector six months later, the legislation had to be flexible. Regarding slot machines, although the risks from their use are known, two observations led to a reassessment of the ban:

- 20% of participants in a survey on online slot machines have acknowledged to have played recently, legally or not;
- Slot machine users tend to play slot games alongside other games.

Juan GARCIA ESPINOSA recognises that the level of risk varies depending on the game. The regulations cannot handle the differences in danger unless there is case by case legislation, but they can direct a comprehensive prevention policy. For one year, all online games have been authorised in Spain and the authorities are satisfied that some illegal gambling has disappeared. Challenges remain but the new regulations encourage responsible behaviour for risk games through identity checks and monthly or daily limits. Some games are even closely watched like online casinos for which sessions have been established requiring the user to define in advance the amount and duration that it will devote to a game. Certainly, once the first session expires, another can be opened but operators are already seeing the benefits of self-control in order to decrease excessive gambling or the use of illegal gambling.

Moreover, public authorities have other regulatory instruments. On the one hand, advertising allows channelling of the demand in a regulated environment; although it also helps to make the game trivial, hence the establishment of more or less stringent legal requirements according to game segment. On the other hand, as a license provider, the Spanish State can verify that illegal gambling vendors are not licensed. Overall, the Spanish legislature considers that the best way to regulate the system is to be completely a part of it.

Juliette DE LA NOUE, Head of Compliance and Public Affairs, BETCLIC, agrees with the finding of the Court of Auditors that "France does not have a very clear games policy" (perhaps with less severity). She considers that the French legislation is paradoxical, and this is at the expense of the interests of players and operators.

She recalls that the Law n ° 2010-476 of 12 May 2010 on the opening up to competition and regulation of the online gambling sector set out four objectives in terms of public health and economy. All of them were achieved but only for the games covered by the law, she insists, namely poker and sports and horse bets online for which the following observed:

- The emergence of a controlling legal offer which could inspire lifting the prohibition of online casinos and gaming tables; Indeed, despite this prohibition, this offer remains attractive for 800 to 900 000 French people who play on the illegal market according to several studies (including from OFDT and IPSOS). The legalisation of these games would conciliate the protection of players and economic issues like in Spain;
- There has been neither a surge in addiction nor a massive fraud phenomenon because between 2010 and 2014, the prevalence of problem gambling among active online gamers went from 8.3% to 3.10% due to market regulation. The regulatory arrangements are effective but do not protect the players of illegal offers although they are potentially the most vulnerable;
- The preservation of the sectors although the viability of online gambling operators is threatened by insufficient profitability. The position of incumbents, however, has been strengthened.

Juliette DE LA NOUE cites the latest activity report of ARJEL which notes that the regulated market with its three authorised game segments is too narrow to ensure balanced development. In addition, the tax base is not based on the income of the operator -the gross gaming revenue (that is to say the stakes minus the winnings redistributed to the players) - but on stakes, which favours an intensive model rather than an extensive one: operators have an interest in favouring players who bet a lot on high odds, rather than recreational players who bet lower amounts on lower odds Today, a sustainable business model for online gaming operators has not been proven, as evidenced by a decline of - 60% of the number of operators since 2010 and a negative operating income on the regulated market since the liberalization in 2010. At the same time, Juliette DE LA NOUE says the prohibited market proliferates and generates gross proceeds of 500 million euros (estimate made on the basis of an average expenditure of 50 euros per month) or, if it was legalised, 200 to 300 million euros in additional tax revenue and 200 to 400 million euros of net income for potential licensed operators.

Finally, Juliette DE LA NOUE asks not to fear the possible consequences of a further opening of the authorised market in France since several European countries have done so without setbacks. In the UK, no addiction phenomenon, nor any consequence on the land-based casinos revenues were observed following the legalisation of online casinos. In addition, the Court of Auditors estimated that in France, the contrasting situations of the players in the sector are not attributable to the opening of the market, including the online games which accounted for only 7% in 2014. Therefore, she is convinced that the legalisation of all games is the best response to the double imperative of player protection and economic sustainability of operators. An opening in two steps, firstly, table games, would confirm the negligible impact on addiction and land-based casino revenues before expanding to slot machines.

In conclusion, **Charles COPPOLANI** highlights the existence of links between the attractiveness of the legal offer and the protection of players and between the viability of the legal market and the health of operators. This is all about the importance of fiscal regulation in the fight against problem gambling which would allow for example a more recreational game of poker around tables where financial commitments are modest. In addition, to protect the players, the legal offer must match the needs and expectations of players, according to the 2010 law. Thanks to digitalisation, risk management instruments are becoming more numerous and therefore when the operator can find out the behaviour of the players, including game by game, he can be expected to provide proposals for prevention tools for problem gambling.

If the law eventually authorised a broader offering, a dialogue between the regulator and the operators could be implemented in order to identify the level of risk of new games and offer the most appropriate preventive measures. Charles COPPOLANI finally recalls that a common market as it is organised today in France (physical network and online network), it is impossible to precisely find out the origin of the addiction of a player who plays on the two networks. He therefore recommends a consolidated approach to the fight against addiction.

➲ **Open debate:**

Intervention 1:

Following a study of the regulated segments (lottery, poker, sports bets, horse bets) **Jean-Michel COSTES** (Gaming Observatory) says it is scientifically established that problem gamblers are less frequent in the regulated offer. He therefore wondered whether Spain carries out large epidemiological studies to prove that the opening of online games allows better protection of the players.
Juan ESPINOSA GARCIA says that he found that in Spain, the channelling of the illegal supply by the legal offer when the latter was extended was not obvious. Nevertheless, the Spanish regulator knows the market better today and can therefore develop legal offers more effectively. The Spanish regulator implements data analysis systems and now knows how to better distinguish the players whose behaviour reveals an addiction from the recreational players.

Intervention 2:

Specialist in all types of addiction, **Amandine LUQUIENS** (Psychiatrist, addiction specialist) said that the players lack clear information about the level of addiction of each game. The danger of gambling, including under exclusive rights, should be further emphasised. Certainly, COJEX negotiated the replacement of *Rapido* by *Amigo* but the clinical difference in terms of efficiency is zero. In the failure to remove risk games from the market, Amandine LUQUIENS proposes adopting clear signage on the level of their addictive potential.

Intervention 3:
Armelle ACHOUR (SOS Joueurs) observed exponential growth, especially in recent years of addiction among the players of the physical network, including with scratch cards, while

online gaming paradoxically brings fewer problem gamblers. SOS Joueurs expects new opportunities for protection, such as a unique identifier per player. The association calls the operators, and even more so when it comes to a monopoly such as the Française des Jeux - of which the state owns 72% - to be exemplary. Armelle ACHOUR recalls how quickly its association launched the alert for games identified as high risk such as *Cash*, *Rapido* or *Multiplicator* and asks for measures to follow this. She calls for the creation of a regulatory authority for all the games.

Raymond BOVERO, Responsible Gaming Director at La Française Des Jeux responds to Amandine LUQUIENS and Armelle ACHOUR that *Rapido* represented at the highest 2.2 billion in revenue while *Amigo* generates a turnover of 1.3 billion. Although a number of studies have shown that many consumers of *Rapido* remained recreational players, Raymond BOVERO emphasises that the Française des Jeux did not hesitate to divide its profit by two to minimize risks. He recognises that the response has been slow, with the first warnings occurring in 2002 and the first tests of players with the Canadian Problem Gambling Index only occurring in 2007. He reminds the audience that the shift from *Rapido* to *Amigo* was closely monitored by the COJEX. Although a part of the former *Rapido* players, including some problem gamblers, are now playing *Amigo*, the studies presented to the COJEX showed that *Amigo* recruited recreational players. Furthermore, Raymond BOVERO wishes to moderate the increase announced by Armelle ACHOUR and recalls that if the Française des Jeux is not always perfectly exemplary at all points, it is nevertheless very committed and performs many tests in order not to expose players to very strong risks of addiction: for example, the Française des Jeux decreased three times the payback percentage of the *Cash* game (from 75% to 71,5%) and stopped the commercialization of the *Multiplicator* game a few weeks after its launch, because a study conducted by the Française Des Jeux showed that this game was gathering a much higher percentage of problem gamblers than other games.

Intervention 4:

Olivier SIMON (Doctor at the Centre of excessive gambling in Switzerland) said that Switzerland struggles to set up a payment mechanism for retailers which does not encourage them to step up the game. He asked for more details on the "responsible gambling" bonus in France. **Hélène GISSEROT** recalls that COJEX initially insisted that the remuneration of retailers was no longer dependent on the revenue so as not to encourage them to sell more. This link between the remuneration of the retailer and the turnover was limited to the PMU and it completely disappeared in the Française des Jeux, which has set up a "responsible gambling" bonus accompanied by a strengthening of the annual inspection of retailers.

(Pause 11:10 - 11:35)

Early detection and interaction with at-risk players

The second panel of the morning, hosted by **Carole LEDUC, in charge of issues related to problem gambling at ARJEL**, concerns the possibility of preventing excessive behaviour using gaming data. This theme covers both the data processing and ways to intervene with the

players.

Jean-Michel COSTES, Secretary General of the French Observatory of Games, presents the first interim results of the study *e-Maje* (ODJ / ARJEL) on a predictive statistical model of problem gambling. Launched in 2014, this statistical study is based on data collected by ARJEL from operators. Jean-Michel Costes recalls that it was conducted in collaboration with a Steering Committee which included the psychiatrist-addiction specialist Amandine LUCQUIENS and the Nantes Reference Centre of excessive gambling. Aiming to describe the playing behaviour of an individual based on the three categories of the Canadian Problem Gambling Index (game without risk or low-risk, moderate-risk gambling, excessive gambling), the predictive model has two functions:

- Permit public authorities or operators to estimate and track the prevalence of problem gambling;
- Guide the development of individualised preventive actions in compliance with ethical rules of public health prevention, which are voluntary and anonymous.

Relating to the Public domain, ARJEL and ODJ chose to jointly develop this model so that it can be used for free by regulators, operators, researchers, etc. Jean-Michel COSTES says that indicators of the ARJEL database are "behavioural markers" selected based on their ability to predict problem gambling patterns, according to the existing scientific knowledge. The reference diagnostic tool selected for this model is the Canadian Problem Gambling Index (CPGI). A sample of 9000 people practicing one or more online games (poker, sports bets, horse bets) has been submitted to the CPGI test:
- 21.4% of the players had a score corresponding to a moderate risk (3-7);
- 9.7% achieved a score corresponding to high risk (8 and above).

Four statistical methods have been tested and a preliminary analysis of the data was performed to identify the explanatory variables (demographics, online activity, and annual statistical indicators). The most contributory variables in the predictive model are related to:
- the individual: sex and age;
- the account: deposit limits and number of open sessions;
- the activities: types of bets, amount of gains / losses / deposits and *chasing* (Number of "3 consecutive deposits over a rolling period of 12 hours").

In addition, the indicators of variation (standard deviation, *extrema*) on the variables related to the account and activity are the most influential.

The predictors to be identified are CPGI scores, in this case the thresholds CPGI 5 and + (problematic threshold) or CPGI 8 and + (excessive threshold). Because of correlated predictor variables and / or missing data and given the sensitivity (the ratio of "true positives" out of the set of "positives") and specificity (ratio of the "true negatives" out of all "negatives") of the model, a margin of error in calculating the prevalence of problem behaviours remains. For a precision closer to the facts, the number of false positives, that is to say, players detected as problematic by the model without being so, should be minimal.

Jean-Michel COSTES shows that the statistical model enables to draw several predictive curves (« ROC » - Receiver Operating Characteristic - curves), which are representing graphically the specificity and sensitivity levels of the model. The results of each of the 4 statistical approaches used can be summarized with a "ROC" curve:

- The more the curve moves away from the diagonal towards the left, the more sensitivity is raised, thus the predictive model detects more "real positives" as problematic;
- The more the curve moves away from the diagonal upward, the more specificity is raised, thus the prediction model detects fewer "false negatives" as non-problematic.

The problem gambling prediction rate is the ratio of players identified as "true positives" or "true negatives" out of the entire sample of players. This rate which allows us to find out the proportion of players correctly classified by the model is not automatically the most relevant criterion. Thus, an operator will be more interested in the specific rates in order to find out the proportion of players with whom he must truly take preventive action whilst a public health actor will promote sensitivity in order to miss as few problem gamblers as possible.

Moreover, the bigger the Area Under the Curve (AUC) is, the better the model performs. The AUC is a synthetic index which reflects the predictive power of the model (value ranging from 0 to 1, 1 being the best predictive power). Since the value of the AUC is greater than 0.7 for all the plotted curves, ARJEL's model can be considered as efficient. It is even greater when applied to a sample of players practicing one game, including sports and horse bets and with CPGI indicator 8 and + for a selected threshold. At this stage of the study, the best model offers a very good level of prediction for the CPGI 8 and + and a good level of prediction for CPGI 5 and +. Other problem gambler tracking models are under consideration to facilitate the implementation of individualised actions.

Raymond BOVERO, Responsible Gaming Director at La Française Des Jeux, discusses the history of the company's responsibility policy.

The responsibility policy of the Française Des Jeux was built in four main steps:

- In 2006, a pedagogical approach to addiction without substance - then unknown - was developed;
- In 2010, independently of Law No. 2010-476, the operator's policy included the co-construction of the games with specialists of problem gambling and co-responsibility in order to increase the playful dimension at the expense of the anxiety aspect;
- In 2012, the Française des jeux set up the tool *SereniGame* to systematically analyse the supply regarding addiction issues and implemented concrete services for problem gamblers;
- Since 2015, the Responsible Gambling Action Plan is aligned with the new strategy of the operator oriented toward *gamification*, digitalisation and sports bets. Now, instead of preventing compulsive gambling, the Française des Jeux encourages recreational play, while strengthening its help and support to people in vulnerable situations and by working with the structures dedicated to the treatment of problem gamblers.

In addition, Raymond BOVERO explains that the tool *Playscan*^TM assesses the potential gambling risk level following five dimensions (emotions, time, finances, etc.):

- If the risk is low, the player, considered as recreational, is shown in green. This type of player accounts for 92% of the *Playscan*^TM analyses but it represents 79% of self-tests;
- If the risk is medium, the player, indicated in yellow, is directed to a moderator. The latter may recommend a self-exclusion request and direct them towards support structures;
- If the risk is strong, the player, shown in red, is directed to a moderator. They are automatically removed from the mailing list for all commercial and advertising communications.

Developed in 2009, compulsory since 2012, *Playscan*^TM is exclusively used online. In the physical network, the device detecting risky behaviour via the "big data", developed in collaboration with IBM, is being tested and should soon be proposed to other lotteries.

Moreover, in the physical network of sale, "abnormal" increases of bets for sensitive ranges, such as sports bets and the *Amigo* game are monitored. When the turnover of the retailer increases too much, an alert is triggered and this can trigger a reminder of good practices, and possibly further investigation. This may result, depending on the assessment of the alerts, in:

- A temporary suspension of the gambling business;
- The setting of a threshold of betting amounts above which the retailer may lose its accreditation on a range of a game;
- Termination of the contract with the Française des Jeux.

30 risk sales outlets had been reported in 2012; nearly 200 in 2015, knowing that the self-learning system "*Big data*" will improve detection.

Moreover, a Harm Reduction approach was implemented. It consists of annual field inspections of the 31 000 outlets of the Française des Jeux. The sales force and inspectors are responsible for identifying retailers at risk (disturbing prevalence of problem gamblers, series of earnings above €300, so-called "jackpots", etc.) and advising retailers faced with problem gamblers. Moreover, young people in civic service are conducting field experiments in four pilot areas where they are responsible for the early detection of risks. Whatever tool is implemented, Raymond BOVERO stresses that the interests of the player, retailer, operator and the French state are treated with equal importance.

Maris BONELLO, **Integrity Analytics and Responsible Gaming Manager at UNIBET** has worked in this group of sports bets, casino and online poker, with licenses in Europe and Australia since her Masters in Psychology. With the analysis of frauds which taught her the importance of prevention, she developed an algorithm to detect risky behaviour. Maris BONELLO also developed procedures aimed at interacting most effectively with problem gamblers.

In this context, she explains that when a player is detected to be "at risk" because of frequent complaints about their losses in customer services, deposits made without provisions, withdrawals followed immediately by a new bet, etc., their account is subject to special attention.

If necessary, their profile (age, sex, nationality) is prepared by teams of the "Responsible Gaming and Integrity" department in order to define an entry into contact that is suited to their characteristics:

- For all types of players: no email but a playful notification, personalised or not;
- For adult players: call with / without prior warning depending on nationality;
- For young players: instant chat online (tchat);
- For women: call by a woman from the customer service.

Once problem gamblers are identified, UNIBET, in order to act, has a call centre employing 122 people trained continuously in problem gambling. When a player is contacted, a solution is proposed in keeping with their profile: game change, brief or long suspension of the session, weekly deposit limit etc. After the call has been made, a summary of the proposed solutions is emailed in order to leave a trace of the player's commitment. Each call must end on a positive note in order to establish trust, a key factor of the preventive approach. If the situation does not get better, a more aggressive approach can be attempted.

Maris BONELLO illustrates her point with the example of a Dutch client practicing casino games. In 2012, she increased the level of deposits several times over a limited period. Thanks to the sensitivity of the algorithm, despite the low increase of the deposit amounts, this player was able to be identified as a risk player immediately after registration. Contacted by phone, she chose to set a budget limit, a limit that she would increase less than a week later. Again contacted by UNIBET, she decided to close her account herself for a period of six months. After this break, she called to express her gratitude for having been supported. Early detection indeed facilitates the treatment of addiction because addiction is often less tenacious when it is recent.

UNIBET therefore favours a preventive approach in its customer relationships. Monitoring the players previously identified as risky for three months allows UNIBET to build a sustainable business model. The operator thus promotes the creation of a large pool of long-term players betting small amounts instead of relying on excessive gamblers. The latter certainly generate a large volume of sales but only in the short term, tending to quickly exclude or be excluded (identification of their addiction, account dry, etc.). Furthermore, brand image improves with the decrease in the prevalence of problem gamblers among its clients, especially if the players contacted appreciate the approach.

In line with previous interventions, Dr **Michael AUER, Business Unit Manager of Predictive Analytics at NECCTON,** comes back to how to act effectively when a risk player is identified. Early detection of risk players is not without faults since the detection models often go along with high false positive rates. This is due to the low percentage of risky players. Knowing that a too strict legislative framework can support the shift towards an illegal environment, the objective of the regulator is to create a safe and fun environment by identifying players at risk and by contacting them individually.

In a study in which players were asked about their perception of losses it turned out that the perception of the player's subjective losses worsened with increasing spending. Michael AUER thus recommends providing players with information about their activities to enable them to adjust the perception of their behaviour. Personalized *feedback* is central to changing problematic behaviour and works especially well for regulating excessive casino players.

Given that all the profiles, - from the *escapist gamblers* to the *binge gambler* - do not have the same characteristics (play time, amount wagered, type of games), it is necessary to adapt "the right message to the right player at the right time" to avoid the development of addictive behaviour.

Indeed, every person, at some point, needs specific information whether they are pathological gamblers, ready to fall into addiction or a formerly dependent one. To persuade them to act, there are several specific techniques:

- The Austrian Lottery has implemented a *pop-up* notification that is displayed after the one thousandth slot game. First, players were informed that they had played one thousand times and had to choose whether they wished to continue playing. After a while the pop-up was changed and the messages incorporated normative feedback and was formulated in a motivational way. The number of players who ceased to play doubled;
- Norsk Tipping chose to individualise messages aimed at its online casino clients. A random sample of players received different types of information about their cumulative losses over the last six months. The study showed that personalized feedback reduces subsequent spending and different types of players benefit from different types of information;
- The tool developed on the principle of "*Big data*" by NECCTON, Mentor, measures the gaming habits and assesses the level of risk presented by the behaviour of the player. It offers players the opportunity to self-assess their gambling behaviour (average number of hours and days of play, average amounts deposited and withdrawn in the previous week) and points out problem gamblers to the operator in a very transparent way in terms of users whose perception does not match reality.

➲ **Open debate:**

Intervention 1:

Jean-Marie JORDAN, Federal Gaming Board (FGB) of the Canton of Bern, thanks Charles COPPOLANI for the invitation and the speakers for their clear presentations. He noted that there are many moderation elements and devices placing the individual at the centre, which is probably not foreign to the interests of operators to identify problem gamblers, but he questioned the actions they set up to help compulsive gamblers.

Carole LEDUC replied that management and remote assistance will be the subject of the discussion in the afternoon.

Intervention 2:

Pierre PERRET, founder of the Institute of Excessive Gambling (IJP) and former player, said that detection is not curative. He explains that it is commendable to track problem gamblers with technological tools but the passion for the game is a human problem. A player in trouble is rarely willing to consider a change in their practice, it is the players who show a

request for assistance that must be helped first. In this configuration, the efforts likely to identify problem gamblers who ignore them are futile. Pierre PERRET even wonders if messages addressed to problem gamblers have perverse effects because they consider that the game is the solution to all their problems. He believes that operators demonstrate idealism if they think distraction is sufficient treatment.

Raymond BOVERO adheres to this finding. However, he also cautions that the primary responsibility of the operator is primary prevention and maintaining a recreational game with a sufficient level of information on misuse of the game or even addiction. Raymond BOVERO explains that as the manager for reducing risks in the Française des Jeux - a daunting task - he believes it is possible to limit the drift towards problem gambling.

(Break in the session from 1.15pm to 2.32pm)

Afternoon introduction

Charles COPPOLANI synthesizes the reflections undertaken and issues raised in the morning session. To fight against gambling addiction, a ban is not a viable solution. We must be able to implement responsible gaming practices through assessments, monitoring tools, a game by game approach and the mobilisation of all stakeholders, especially operators.

Problem gamblers rarely look for help spontaneously due to psychological barriers, shame, and a need for anonymity. The internet use provides an opportunity for treatment, firstly for e-prevention aimed at the players at risk (use of moderators, messages) and also for e-therapy for compulsive gamblers. The e-therapy is a system based on an online platform providing access to auto-exercises, and to possibly gain the individual support of therapists. This method has been validated by a number of scientific studies which especially put forward the following positive aspects:

- A way of reaching a spontaneously reluctant audience regarding the help;
- Greater accessibility to the system;
- Anonymous approach;
- The e-therapies have proven as effective as the conventional therapies;
- Less expensive systems.

Internet-based interventions for problem gamblers: return of experience and views

The first panel of the afternoon, discussed by **Jean-Michel COSTES, Secretary General at the French Observatory of Games**, focuses on the various remote assistance systems already in place and their future prospects.

Karine GROUARD, Deputy Director of the French National Helpline for Problem Gamblers at Santé Publique France (French national public health agency) is in charge of the player info service system, which offers help remotely through a helpline and a website, before the *e-therapy*. This line was created in June 2010 as a result of the law on competition and regulation of the online gambling industry and is managed by **Santé Publique France**. This anonymous and confidential system is accessible by phone, tchat, and Internet (the site was opened in January 2013 and has since hosted 9.2 million visitors). Its mission is to inform, guide, advice and support people who have a gambling problem and their relatives.

Since June 2010, 19,381 requests for help and information have been dealt with, of which 62% came directly from the players and 35% from their acquaintances. While the share of poker-related requests has been falling since 2010, that related to bets remains constant (30% in 2015).

Regarding the profile of these players asking for assistance, they are mostly men (74%), for much older than 40 years old (45%) and show an intensive practice of the game over a long time. They also often demonstrate the same intimate motivations pushing them to play: boredom, loneliness, loss of a loved one...

In contrast, acquaintances asking for help are female at 77% and essentially spouses (33%), parents (28%) and children (14%) of the players.

Often supported players have called while they were in a situation of deep distress ("burnt"), in a dramatic financial situation, with the expressed desire to disappear in a situation that they think is unsolvable. Supported players tend to perceive their problem as external to themselves and release their anger on the state and gambling operators, often with violence. They complain in particular about the availability of the supply of games, of the ease of playing in tobacco shops or unauthorised sites, reminders from operators and credits granted by some tobacconists.

Karine GROUARD expresses the poignant testimony of two players that describe the confinement process related to the game and the long maturation period which players need to feel able to ask for help, after realising the reality of the addiction and the associated loss of control.

To help these players in demand, the immediacy and anonymity of the system are essential as they contribute to speech being freed and thus promoting the necessary awareness. The system then aims to concretely inform the player about the possible help in terms of their profile and motivation (gambling ban, treatment centres, etc.) but also to improve their motivation to change, to value the initiatives they already took, to give them support by helping them put into words their difficulties and their suffering.

Karine GROUARD highlights a recurring problem of confusion for players who associate the player info service number with the hotline number of online operators (82% of requests dealt with) - a problem that is explained by the lack of visibility, the lack of a support number in the operators premises, the state of mind of the player who is pressed to play, but also the content of the messages which is not well identified.

Finally, Karine GROUARD presents three systems already in place that can inspire systems that are specific to gambling:

- The first is the hydrometer available on the alcohol-info service site, an online tool that allows a self-assessment to be completed of their consumption and to be accompanied in the monitoring of set objectives. The programme has shown its effectiveness in 6 weeks.
- The second is the German programme in the study "Quit the shit" to reduce or stop the use of cannabis, which demonstrated a reduction in the frequency and amount consumed at 3 months. It combines a chat at the start and end of the programme and a logbook to complete and weekly feedback from therapists.
- The third initiative is the example of the tobacco info service which provides a fully automated support tool over 3 months, including emails written by tobaccologists. There was also an application to enable access to varied content and support tailored to the different stages of the path to stopping smoking.

Dr Amandine LUQUIENS, Head of the "Gambling Addiction" unit at Paul Brousse Hospital, identifies 3 major challenges faced in the field of gambling, especially for online games: the increased risk of web media, the lack of help-seeking and the few therapeutic approaches available (limited to psychotherapy).

This observation invites us to favour the identification of problem gamblers and to directly approach them to offer them support. Given the reluctance already mentioned by many people of following a care treatment course face to face, it is necessary to develop remote help features. As mentioned by Karine GROUARD, systems already exist, such as forums or more recently, applications. It is now about assessing the effectiveness of these systems, and particularly for those affected by the most severe addictions.

For now, only two randomised trials have been conducted to test this type of intervention. The most recent was conducted three years ago and was focused on exclusively online interventions.

The initial approach of the study launched in 2013 was to go and meet players from the Winamax operator and to routinely offer screening for a month for active players. A sample of over 1,000 players was offered various interventions of increasing intensity in terms of personal commitment and active support. The first intervention only consisted in being placed on a waiting-list (control group), but it should be noted that, in order to be included in the study, all players had to be actively identified as problem gamblers and to accept to participate in a clinical trial aiming at regaining control over their gambling behaviour. The second intervention with another group consisted of an email of normative feedback. The third group had the opportunity to download an online help manual by themselves which was based on a motivational and cognitive-behavioural approach. The fourth group was based on the same programme, which was however provided each week by a psychologist with whom the player had the opportunity to discuss their progress. The sample of players consisted of rather young people compared to traditional risk players.

The first overall result is that all the players that were helped got better and were less invested in the game. A third of the players were also no longer considered problematic. However, the study was not able to show the difference between the groups according to the incremental approaches that were proposed (normative feedback or more intensive support). The difference that was revealed in fact concerned the acceptability of the programmes: the more highly stressed the players were, the less they responded to the assessments. For example, only 5% of the players involved in the programme with the psychologist had responded to feedback in 6 weeks.

The study was also able to rely on the data of the player accounts in order to find out how they behaved. The players of the first group continued to lose money but the other three groups, on average, saw their losses decrease. However, it was not possible to determine significant differences between groups on the financial criterion, demonstrating the methodological limitations of this kind of approach. On the one hand, players, including problem gamblers, can sometimes win money, which limits the scope of the financial criterion. On the other hand, there is a very wide dispersion of financial variables (the standard deviation goes up to 11 000 euro). Finally, it was noticed that it was very difficult to ensure the cooperation and commitment of the players based solely on online tools.

The publication of these results highlighted several challenges for the study of alterations in neuropsychological functioning. It is known that some cognitive functions are less efficient in the players than in the general population, including cognitive control abilities, and in particular inhibition capacities. The team has thus tried to develop work that is focused on this problem with a computer program accessible on the Internet, without face to face contact, and aimed at training this cognitive function. The program, already used in many fields (psychiatry, neurology) consists of six exercises scaled to motivate players and it relies on the support of a neuropsychologist to analyse the relationship with their gambling practices. The level of difficulty is growing.

This computer program is already being used on a day-to-day basis. When observing players who benefit from this program, the main result is that the players are rather curious about this alternative approach that promotes a better investment. A study should be quickly set up to test this system online, with recruitment by telephone to ensure greater patient engagement. This system will be compared with another control program that will test visual acuity alone. The evaluation will be based on clinical data, their skills in relation to gambling, financial data and information about their gambling behaviour.

Amandine LUQUIENS concludes that proactive screening with minimal advice can bear fruit. But in the case of a person requesting care, it is difficult to propose solutions solely online and also without being too intrusive. It seems more efficient to leave the choice to the player regarding their level of support. In general, it is important to continue conducting research on the subject to be able to count on reliable data and thus offer tailored and efficient solutions.

Dr. Per CARLBRING, Professor at the University of Stockholm, participated in numerous studies on the topic of addictions since 1990 and how to treat them online.

He attempts to replicate online the observations and methods regarding patients seen face-to-face. In Sweden, the first step consists of performing a diagnosis to assess what treatment is best suited to the individual. Regarding the topics of gambling addiction, there are many treatments available online or by telephone to the extent where those concerned are reluctant to come to treatment centres.

Online treatment consists of giving the patient a book where he has to read a chapter a week and complete the associated exercises. Per CARLBRING emphasises the importance of these exercises in order to assess progress. The exercises should be sent to the therapist, who then makes comments in return. The number of comments varies depending on the approaches. In Sweden, it is considered that the therapist has to spend between ten and fifteen minutes per week per patient in drafting comments. Per CARLBRING also addresses another 2007 study which shows the importance of the support of a therapist in the success of a treatment, the chances of success are proportional (to a certain extent) to the time spent with the therapist. Nevertheless, in 2014, a study showed that the instructions and comments of a therapist are useful but less critical than previously thought. In addition, the skills of the *e-coach* are not really important to the success of the treatment. The typical response of the *e-coach* must recognise the hard work carried out by the patient, then normalise their situation by demonstrating that these feelings and difficulties are shared by many others. Then it consists

of summarising what is encouraging in the patient's remarks, showing them they are on track and explaining any possible misunderstandings.

Regarding the effectiveness of online treatments, meta-analyses have shown that they also work as well as face-to-face treatments for depression and anxiety and that the dropout rate was approximately the same.

Another 2008 study exclusively examined problematic online players after 6, 18 and 36 months. A first result highlighted the benefits for patients of a weekly telephone call lasting 10 minutes with a coach. Another result showed that some people for whom gambling problems had disappeared after 6 months had the problems return again after 18 months.

Two new studies were conducted in order to study the problem gamblers who denied their addiction. The study consisted of directly targeting their acquaintances that were worried about the addiction in order to change the player's environment and whether the inclusion of relatives in the therapy was beneficial.

➲ **Open debate:**

Intervention 1:

A question was posed to **Dr. Per CARLBRING** on how to select the coaches, questioning the idea that suggests they would not need specific skills.

For **Per CARLBRING** the general idea is that it is very positive to have an exchange with someone rather than staying alone. The importance of the coach lies primarily in its ability to properly support and motivate the patient, who especially requires training rather than actual skills.

Intervention 2:

Another question was posed to **Amandine LUQUIENS** about the inclusion of comorbidity in the studies conducted.

Amandine LUQUIENS replied that the first study deliberately chose a less interactive approach in terms of the identification of other potential problems. The next study, meanwhile, will enable researchers to collect a minimum of clinical data (co-addiction, depression) to explain the particular inhomogeneous results.

The efficiency of gambling limitations

The second panel of the afternoon is hosted by **Carole LEDUC, in charge of issues related to problem gambling in ARJEL.**

Carole LEDUC recalls that there are a number of legal provisions already in place with the 2010 law such as the deposit limit, the betting limit and the self-exclusion system. The aim of this discussion is to review these systems and to reflect on possible improvements.

Norbert BOYEN is a representative of the Belgian Gaming Commission, founded in 2001 and based on two laws: the Law on games called "terrestrial" of 1999 and the law on online games of 2010. Player protection, the issuance of gambling licences, and market regulation are its main missions. The Commission is under the authority of the federal government and not the regional government, which enables to impose the same standards throughout the whole of Belgium.

In Belgium, the Commission manages almost everything. For example, it itself determines the volume of bonuses or the screen position where the help banner should be for players at risk. It also offers high-quality databases, which allow investigations on money laundering to be carried out.

Operator control is very strict with a significant administrative file to be provided and a minimum distance of 1000 metres between each betting agency. In addition, all game sites in Belgium must be hosted on Belgian servers, enabling better control and better analysis of data provided by the operators, especially regarding the hourly average loss for a slot machine or a game. The operators have also the obligation to repay the players winnings for at least 80% of the stakes, a rate that rises to 95% online. Finally, the number of licences granted by category of games (casino, virtual casino, sports betting, etc.) is limited.

Regarding coaching in casinos, the staff working there must have obtained a D licence after taking a course in e-learning and passed an examination.

Age control is performed strictly (21 years old for the online casino and 18 for the bingo halls) and since 2015, it is mandatory to install an ID reader on the machines. In casinos, player identification is done with the triplet "surname-first name-date of birth", which is immediately communicated to the Commission for review.

In addition, there is a database called EPIS (Exclusion Person and Identification System) that identifies people who are banned from playing (300 000 today). One can voluntarily register in the database (exclusion of a minimum of 3 months), or be registered by a third party (exclusion of up to 1 year if the record is validated by the commission). After one year, the excluded person can replay if they demonstrate to have received coaching and have regained a healthy financial situation. People were also excluded due to their high indebtedness (120 000 people).

For the identification of players in online games, the triplet surname-first name-date of birth is not enough. The Commission has the ability to control the identity number of players using the national identity register, which costs the commission 100 000 euros per year. On each creation of a new profile, the latter is transferred to the commission that grants the permission to play or not. It controls on the one hand, if the person is not already in the EPIS database (whether it is excluded) and on the other hand, it verifies the identity and age of the person in the national register.

Carole LEDUC, in charge of issues related to problem gambling in ARJEL reviews the moderators in France.

For most players, the betting limit and the repayment threshold are the moderators that are most often misunderstood. These are not the values of the limits that have been studied but the correlation between actual player spending and the limit they set for themselves:

- Deposit limit: For 40% of players, the limit is consistent; but for 36% of them, it seems inappropriate with a maximum deposit for the year of less than 10% of their limits. The pre-filling out of the fields by some operators is probably the cause of this difference; it indeed encourages players to indicate a higher deposit limit. Moreover, quite a number of players reach at least twice their deposit limit, which shows a good use of the moderator.
- Betting limit: This moderator is more controversial because players are struggling to integrate the fact it also includes the amount of their winnings recycled in the form of bets. Indeed, Carole LEDUC stresses that a majority of players set an inconsistent betting limit since 60% of them total bets lower than 10% of the set limit. The moderator seems useful for a minority of players as also indicated by the small proportion of them having reached 2 times their bet limit.
- Repayment threshold: it aims to avoid the systematic recycling of player winnings. For most of them, this threshold is very high, which can again be explained by the pre-filling of the threshold by operators. Indeed, the threshold is much lower when the players have a choice, which is useful since most of them do not revalue their threshold. It is not essential as players with high pay out thresholds pay back their gains manually about as often as do the players with a low threshold.

Julie CAILLON, psychologist at the Federative Institute of Behavioural Addictions from the University Hospital of Nantes describes a study conducted since 2013 at Nantes University Hospital on evaluating the effectiveness of certain gaming moderators: self-limitation in time, in money, informational pop-ups, self-exclusion and impact of the bonus game on the risk players. The objective of the study is to find out the use that players make of the moderators and their feelings about these systems and the operators that implement them.

The players know very little of the proposed moderators. The best known are those related to money limits. However, self-exclusion or the gambling ban is less well known. Most players misunderstand the operation of the moderators and change the default entries very little or values indicate high values so as not to be blocked.

Regarding the commercial use of bonuses, many players think that they have little impact on their gambling behaviour because they are not very frequent and because their amount is low. However, this perception seems to be contradicted by the first results of the study which assesses the impact of bonuses on risk-taking while gambling.

When players have questioned the interest of the moderators, they are positively perceived and give a good image of the operator. However, most players emphasise that the limits can be circumvented easily and there should be customised tools (e.g. with questionnaires to help them set appropriate limits and to properly use the moderators).

The 3 moderators perceived as the most relevant are:

- Money self-limitation that prevents absolutely wanting to win back the money lost;
- Voluntary self-exclusion;
- Auto-evaluative pop-ups, which would be even more interesting if the messages were targeted to risk profiles.

On the contrary, limiting bonuses and informative pop-ups are the most unpopular moderators. For players, the bonuses are ambivalent and informative pop-ups simply pollute the gaming environment. For many players, operators set up moderators because they are forced to do so. According to them it would be interesting to have a general system for all operators to make these tools more credible and have customised approaches, particularly for pathological gamblers on whom these moderators have very little effectiveness.

Alexandre ROOS, CEO of Winamax considers that the two moderators imposed by the law do not make sense for poker. Winamax proposes other more relevant moderators. The first is a monthly or weekly loss limit that attracted 35,000 players (over 400,000). The second is a weekly game time moderator designed to reduce the risk of social isolation and disconnection from reality (2500 players use it). As these moderators are not mandatory, the people who use them only indicate more consistent limits than for mandatory moderators. Moderators were also created so that players could ban certain game modes that they consider more risky.

Regarding the methods to improve the understanding and proper use of the moderators, Alexandre ROOS stresses that players are more receptive to them later in their experience of play. Indeed, the player is often in a hurry during registration, which already takes long. Winamax thus proposes new players to adjust the deposit moderator from the 4th deposit in 24 hours, which could prevent them from slipping. Alexandre ROOS also finds it interesting to think about cross-operator moderators, preventing players from getting around their moderators by playing with another operator. It is a complex technological issue but probably a useful focus to follow.

➲ **Open debate:**

Judicaël LEFEBVRE, CSR Manager at the PMU intervenes to raise the possibility for the player to try mock moderators in order to better understand them.

Addiction on the frontiers of gambling: regulatory challenges

The third panel of the afternoon is hosted by **Clément MARTIN-SAINT-LEON, Director of Markets, Consumption and Forecasting at ARJEL** and aims to focus on the mechanisms of loss of control in sectors other than gambling.

Marc VALLEUR, Psychiatrist at the Marmottan hospital considers that a huge part of what has been said about addiction to gambling could be applied to all types of addictions, including substance addiction. In any case, neither prohibition nor total opening are viable solutions and it is important to avoid any taboo on these issues.

We can think about addiction to gambling with the triple approach substance-person-sociocultural moment that is usually applied to substance addiction. The socio-cultural moment is decisive in the case of online gambling since it is the result of the development of NICTs.

There are two main roads leading to addiction. The first is impulsivity, which pushes the player to make risky choices. This reaction often involves young people and men who seek to put their lives at stake in a Dostoyevsky model where the player almost puts their destiny in the hands of God. These players paradoxically feel a sense of control and prefer games with a dimension of choice, such as horse bets and poker, as if divine judgment was a recognition of their value.

In contrast, there are players who are addicted through self-medication. This concerns depressed and anxious people, who are often frail and fall into a physiological dependence. These people find refuge in the game through the repetition of a habit, in order to forget their daily problems. Between the two, there are conditioned addicted players which are essentially victims of the product.

What is particularly demanding in gambling is that the money we bet with entails a risk that is anchored in reality. Freud indeed defined reality as the opposite of the game but money just comes in here to make the link between the game and reality. In contrast, video games place risk in the virtual world.

Simon LERNER is a Policy Director at the International Social Games Association (IASG) founded 4 years ago in response to the rise of online games on social media such as *Candy Crush* and *Farmville* and this includes the "social casino sector". His work focuses mainly on social games in which optional purchases are possible.

The ISGA works with regulators, including through research, to allow the adoption of good practices by companies that are active in the market for online games, especially in terms of commercial practices (presentation of games, potentially addictive characteristics, and the presence of paid content). The ISGA also converses with consumers: one of its projects is an information portal for consumers to provide useful advice (e.g. how to set up parental controls or give access to the opinions of psychologists and experts regarding the possible consequences of those games). To protect consumers, the European Union has already introduced several measures to ensure transparency in optional purchases and best advertising practices.

The ISGA also conducts research on the increasing development of social games and their origin. Furthermore, in reaction to the debates on parents' money spent by their children, research projects are studying whether children can be exploited by social games.

On the issue of regulation, it is not necessarily relevant for Simon LERNER to oppose the regulation by the industry and regulation by the state, which have different uses.

Video games are controlled by laws of protection and transparency in Europe but these are not always well understood. The publication of good practice guides sometimes allows to precisely facilitate the implementation of state regulations, making the regulations more comprehensible for developers.

For Simon LERNER, it is difficult to compare social games and gambling. Gambling poses very specific problems, including the chasing of losses. The same rules for both types of games are not the most appropriate response.

Claire CASTANET, Head of the Department of the Relations with Savers, French Financial Markets Regulatory Authority (AMF) highlights the risks of addiction in trading in the binary option and Forex, which are also the source of many scams. Indeed, there are sites that offer investments outside the regulated sector and these are sometimes fraudulent. Claire CASTANET gives the example of a particular person who lost 250,000 euros on a fake site. The Paris prosecutor estimated 4 billion euros as the amount of losses related to the market over 6 years. Often, they are fragile people (unemployed, elderly) who are the victims of these scams relating to market investments, but also upper socio-economic groups

Investing via binary options is a process which has significant similarities with betting. First, these investments appear to be easily and quickly profitable and they are possible to achieve at any time. Moreover, this apparent facility creates a sense of control in the new participant. Finally, this type of offer provides access to bonuses and gifts. There are also aggressive marketing techniques that are quite similar to those in betting games.
An important difference with bets is found in the process time. While bets players sometimes take years to realise their problem, a rogue site disappears once the customers have been ruined. The customer does not need to take it upon himself to fight against his addiction and stop, like in poker, it is the crook who leaves the client.

These scams on fake trading sites have serious psychological consequences. There is a risk of de-socialisation for people who have convinced those close to them to invest heavily on these sites, and victims often feel a strong sense of shame and a need for anonymity. There is no comprehensive study to establish the social profile of persons subject to these scams.

⮷ **Open debate:**

Intervention 1:
A first question is addressed to **Claire CASTANET** on the social profile of people practicing trading.

Claire CASTANET responds that there is no comprehensive study on the subject since they do not have access to data from these investors.

Intervention 2:
A note is made regarding binary trading to underline, compared to sports bets where there are ratings, a lack of available information on the very low chances of winning on these sites, even legal information, because of the complexity of the products.

Claire CASTANET completes this remark by adding that the AMF considers today that investments in binary options or Forex are not suitable for the general public. Indeed, the AMF conducted a study in 2014 which shows that customers of supposedly "serious" websites lose money in 9 cases out of 10, with an average loss of 10 900€ The new European directive "MIF2", which will allow the prohibition of these services, will only come into force

on January 3rd 2018. Meanwhile, the Sapin 2 law will prohibit advertising for high-risk investments such as binary options and Forex.

Intervention 3:

A question was addressed to **Marc VALLEUR** as to whether young people playing video games tended to be more likely to participate in gambling.

Marc VALLEUR responded that the few studies published on the subject show that playing video games encourages youth to participate in gambling later on, especially with the development of games such as the "pay to play" type like *Candy Crush*.

Conclusion by Charles COPPOLANI

Thank you all for your participation: the debates were as vibrant as I had hoped. They confirm that we need to evolve our authorized offer by reflecting on an offer from the XXI century that is both attractive and controlled. This reflection should closely involve the world of research to find the right tools for detecting, monitoring and controlling gambling practices so that it remains a recreational and controlled leisure activity.

I know money will need to be invested in it, that intelligence and the imagination must be stimulated but it is an investment that is justified by the increasingly assertive attraction of our citizens to gaming in general and in particular to gambling.

With your permission I will conclude quickly regarding some evidence that was raised in our debates

-firstly, the player who indulges in gambling and provided he is 18 and not banned from playing, is a responsible adult who has the right to gamble including in an abusive and irrational way: we are responsible within limits that are defined around three principles of action: education, prevention and care, it being understood that the latter is not a matter for the regulator. We are all agreed on one point: the intrusion and violation of the individual freedom of the player are not only illegitimate but often counterproductive for the person you want help.

-secondly, and more specifically regarding the measurement of the performance of the regulator in the fight against addiction, the level of efficiency is not measured according to the distribution channel as is the case for regulation. In this area there are communicating vessels and our action will only be truly effective on two conditions:

-on the one hand, having data available for the entire authorised gambling sector: that is to say the physical network and the online network as players increasingly use both networks indifferently

-on the other hand, harmonising the two networks so that the same rules apply as well as the same level of protection on the online network or live network whether the customer is a minor, prohibited player or simply a player.

Finally I conclude by mentioning a project that I am undertaking on a European level: a gaming observatory that would coordinate studies on a European level, particularly with the Canadian Problem Gambling Index (CPGI) measurement tool as the primary subject of study, in order to adapt it better to each category of games.

Thank you all for your participation.