BEHAVIOURAL TRACKING, RESPONSIBLE GAMBLING TOOLS, AND ONLINE VOLUNTARY SELF-EXCLUSION: IMPLICATIONS FOR PROBLEM GAMBLERS

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Technology has made a substantial impact on gambling over the past decade. Consequently, online gambling has seen major growth via the availability and convenience of the internet and through innovative technology that has made remote gambling possible. Online gambling provides convenience and the ability to gamble from home and the workplace (Griffiths, 2009a). The rapid expansion in internet gambling has meant that gambling regulation has often lagged behind. For instance, online gambling and the lack of regulation at a European Union level has opened the possibility for gambling business to be offered to consumers from remote locations. An illustration of this is the large number of gambling operators that reside in Malta where these operators abide by license requirements which are imposed by the local Maltese authority, rendering borderless gambling possible (Auer & Griffiths, 2013a).

This raises concerns about both increased gambling availability and consumer protection. However, new technology has given rise to innovative ways in protecting online gamblers (Harris & Griffiths, 2017). Despite internet gambling often being seen negatively due to its high accessibility and convenience because it may increase the occurrence of problem gambling due to higher gambling exposure (Griffiths et al., 2009), research suggests that online gambling providers can offer superior, more accessible and tailored responsible gambling tools (Harris & Griffiths, 2017).

Through the growth of online gambling, new opportunities have arisen to analyse data for consumer protection, which in

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turn may be used by different stakeholders such as academics, gaming operators, regulators, and policymakers (Griffiths & Whitty, 2010). This has raised a further argument that consumer protection and the behavioural tracking of online players may cause tensions for the gambling provider because the commercial interests may supersede the operator's responsible gambling interests (Jones, et al., 2009). However, this consumer monitoring is not something novel for the industry because it has previously been used (and still is) for marketing segmentation and risk management (Dragicevic, et al., 2011). Furthermore, being able to help and tailor responsible gambling approaches for the consumer is key to risk management because mishandling of responsible gambling issues may raise problems for the operator with the regulator that may incur financial and reputational risks (Stradbrooke, 2016). One example of this, can be seen in the United Kingdom where the Gambling Commission has fined gambling operators for failing consumer protection and has also taken action against the individuals who were responsible for these failings (Gambling Commission, 2018).

Increasingly, regulatory requirements have focused upon providing consumers with responsible gambling features such as being able to choose and activate deposit, time, and monetary loss limits, and voluntary self-exclusion (VSE) options (Dragicevic, et al., 2015; Harris & Griffiths, 2017). VSE is an essential tool offered by gambling operators that is designed to limit access to gambling opportunities in both land-based gambling venues and online gambling websites for predetermined periods of time (Dragicevic, et al., 2015). Research conducted on 30 major gambling operators just as online gambling was starting to take off noted that 29 of them showed no evidence that gamblers could access such a feature as VSE (Smeaton & Griffiths, 2004). However, this has changed over recent years because responsible gambling has increased in importance, and jurisdictional regulators are imposing more pressure by requiring gambling operators to have player protection measures in place before the issuing of an operating license and the maintenance of one. In 2017, we carried out a similar study to that of Smeaton and Griffiths where we examined the websites of 50 leading online gambling operators and reported that 86% of the operators were offering VSE. Some allowed activation of VSE online, whereas other operators allowed VSE by contacting the operator's customer service department (Bonello & Griffiths, 2017).

An additional tool that is unique to online gambling (as opposed to land-based venues unless they require a player card to gamble) is the possibility of monitoring and logging consumers' activity at minimal costs for the operator (Griffiths, 2009b; Griffiths & Whitty, 2010). This goes hand-in-hand with the increased consideration displayed by the online gambling operators, and the regulators that are advocating harm minimisation (Percy, et al., 2016). According to Adami, et al. (2013), by analysing risk factors utilising online gambling data, online operators have the possibility to give better feedback to the consumers who in turn can make more informed decisions about how they gamble. Through this proactive approach, operators achieve a greater chance to reduce and prevent gambling-related harm. Moreover, this availability of behavioural player data allows researchers to examine whether such protective measures are effective. Despite this, one of the greatest limitations is how to interpret such data to its fullest, particularly in relation to gambling intensity and the early detection of possible online problem gambling (Griffiths, 2009b).

In a simulation study of 300,000 gamblers, Auer et al. (2012) developed a measure to assess gambling intensity to which they refer to as 'theoretical loss' which is done by simply multiplying stake size by the probability of winning. This was then tested by Auer and Griffiths (2014) on a real sample of 100,000 online gamblers and they demonstrated theoretical loss is a robust and reliable measure of gambling intensity. The measure has subsequently been used to evaluate the effectiveness of various

responsible gambling tools including limit setting features (Auer & Griffiths, 2013b), loss-limit reminders (Auer, Hopfgartner & Griffiths, 2018), and personalized feedback (Auer & Griffiths, 2015, 2016).

A study by Haefeli, et al. (2011) examined customer communication leading to VSE by online gamblers in order to determine whether there were behavioural indicators for online problem gamblers. The study found that customer correspondence, such as the frequency of customer service contacts, and tonality of the emails were useful predictors for online gambling problems. This was an innovative way of examining problem gambling because online operators use online customer communication as a cost-effective measure to reduce face-to-face customer contacts. Dragicevic, et al. (2015) analysed de-identified player data from GTECH G2 (an internet gambling software provider) and found that voluntary self-excluders suffered greater losses and played a larger variety of games when compared to a control group. This study provided the opportunity of analysing consumer data across different operators because other studies have been limited to data from one gambling provider only. However, most online gambling operators have more than one gambling software provider, therefore the data might have been limited from another perspective in that not all account information might have been available for analysis.

Research carried out in collaboration with Bwin Interactive has analysed data from gamblers participating in online sports betting. LaBrie et al. (2007) analysed the data of heavily involved gamblers who had registered with the operator in February 2005. Although this may provide possible indicators of problem gambling, being heavily involved in gambling may not always mean that the behaviour is problematic because this is dependent upon other social and economic factors, including disposable income and the sporting teams they support (because specific gamblers might gamble more if the team they support is playing).

Another study using data from the same gambling operator examined the first 90 days of gambler activity in order to determine possible problem gambling indicators. This showed that the highest betting activity was observed in the beginning of the account registration and was followed by a gradual decrease. This research also indicated that there was an episodic increase in betting activity approximately every seven days (LaPlante, et al., 2008). Although this might provide information about the gambling behaviour for online gamblers, there are other issues that must be taken into account. Primarily, the initial days with a gambling operator is unlikely to be the gambler's initial betting activity overall because these gamblers are likely to have been playing with other operators prior to registering with Bwin Interactive. Secondly, higher initial betting activity may also be due to gamblers exploring the website and trying out different gambling opportunities provided by the operator, or due to the fact that most operators give acquisition bonuses which must be used within a specific time period after registration. The increase in the betting activity every seven days

Mark D. Griffiths

is likely to be due to the availability of sporting events to bet upon because there is typically a higher occurrence of sporting events to bet on at weekends.

Haeusler (2016) evaluated behavioural data of 2,696 real-money gamblers by exploring payment transactions of gamblers who used VSE. The results showed an inconsistency of withdrawal amounts (i.e., switching between very high and very low withdrawal amounts) and may be viewed as a possible online problem gambling indicator. Using payment data to identify a problem gambling indicator might be innovative but not all gamblers who choose VSE are using this option due to problem gambling behaviour with the operator or overall (Griffiths & Auer, 2016). In fact, it was observed by Haeusler that 23.3% of those who had used VSE in January 2015, had no deposit payment at all in 2014 with that specific operator. This may be due to the gambler self-excluding because of problem gambling with another operator, or simply due to annoyance with the current operator they had registered for (Griffiths & Auer, 2016).

In another study to identify possible behavioural markers of problem gambling, gamblers who actively used responsible gambling interventions were examined (Gray, et al., 2012). These interventions included, amongst others, gamblers reporting a problem, changing of money limits, partial account blocks, complaints about fair play, and cancelling payment withdrawals. The study also showed that those using responsible gambling tools had significantly more gambling activity across different products. Although this gives a possible indication of problem gamblers' activity, these responsible gambling events only considered gamblers who had contacted customer service. This excludes online gamblers who might be too ashamed or did not wish to contact customer service. In another study using Bwin Interactive data, individuals who used a web-based account closure system were analysed (Xuan &

Shaffer, 2009). This is arguably a better way to study behavioural indicators for problem gambling using gambler data because it provides a more representative gambler sample who are utilizing preventive tools in their online gambling activity. This study showed that just prior to closing their account, gamblers had increasing losses and chased losses through higher stakes on less risky bets. The higher amount of money risked and increasing losses were also evident in problem gambling account closures in another study by LaBrie and Shaffer (2011).

VSE has been used as a proxy measure for problematic gambling in previous studies (e.g., Percy, et al., 2016; Braverman & Shaffer, 2012; Haefeli, et al., 2011; LaBrie & Shaffer, 2011). The problem with using this proxy measure is that VSE – especially in the online gambling environment – may not always be the best measure to use as an indicator for problem gambling (Griffiths & Auer, 2016). Despite studies examining gambling activity prior to VSE, there is little published empirical research on the effectiveness of it for online gamblers. LaBrie and Shaffer (2010) used VSE as a proxy measure for problem gambling due to evidence from previous land-based studies. Ladouceur et al. (2000) showed that the majority of self-excluders in the land-based casinos met the clinical criteria for gambling disorder. Nonetheless, online gambling is psychologically and structurally different from land-based gambling in many respects such as increased disinhibition and perceived anonymity which can negatively impact gambling behaviour as well as evidence showing online environments can impair decision-making judgments and increase impulsivity (Griffiths, 2003).

As highlighted by Griffiths and Auer (2016), VSE is not necessarily a good proxy measure for at-risk or problem gamblers because there is no proof of a direct relationship and online gamblers display several other reasons for self-excluding. In fact, the research by Dragicevic et al. (2015) showed that a large proportion of online gamblers self-exclude within the first 15 days of activity, with 25% self-excluding within the same day of account registration. This could be due to gamblers experimenting and evaluating the online gambling operator, or the sign-up bonuses not being up to the gambler's expectations (and therefore, VSE having nothing to do with problem gambling). Online VSE does not appear to have the same stigma and bureaucracy associated in the land-based setting (Dragicevic, et al., 2015). Moreover, it must be kept in mind that by self-excluding from one operator, this does not mean the individual cannot gamble online. A gambler may self-exclude from one operator and within a few minutes be registered and/or gambling with another one.

Although behavioural prediction may provide (i) individual player protection and interventions tailored to the gambler's needs (Haeusler, 2016), and (ii) data objectivity due to very large sample sizes (Auer & Griffiths, 2014), there may be a greater need to actually understand gambler activity without the predisposition of affirming problematic gambling utilising VSE. Primarily, VSE only covers one part of the spectrum of gamblers' behaviour (Haeusler, 2016). Furthermore, VSE – particularly short-term VSE, also referred to as time-outs under the UK license – may be used as a responsible gambling measure rather than a problem gambling prevention measure as demonstrated in a survey study of almost 2500 Swedish gamblers by Griffiths, et al. (2009). In a study by Hayer and Meyer (2011), the reasons for VSE were explored. Although most indicated potential problem gambling as a reason for self-excluding, such as losing too much money gambling (51.7%) or spending too much time gambling (35.5%), 26.3% of the self-excluders did so due to simply being annoyed with the gambling operator. In fact, online gambling provides very quick and easy access to responsible gambling tools, including VSE (Philander & MacKay, 2014), and so this might make it easier for someone to self-exclude for reasons that have nothing to do with responsible gambling or problem gambling.

This should not be interpreted that online gambling operators should make VSE or any other responsible gambling tool harder to access, but potentially to look at better ways of preventing the misuse of VSE. Moreover, this should always be considered when examining the activity of self-excluded gamblers to determine behavioural indicators of possible problem gamblers. There is a high chance that by examining VSE only to determine risk indicators, the gambling operator is either examining a limited group (i.e., not all problem gamblers) or gamblers with no problem gambling-related experience. Providing tailored help and attempting early detection of problem gambling will help players to regulate their gambling. This will lead to more sustainable long-term revenue for the gambling operator (Percy, et al., 2016). :: CGi

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