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A recent paper published in *Gaming Law Review* by Mulligan [1] examined whether ‘gamification’ and ‘responsible gaming’ were “*friends or foes*” (p.405) yet the most obvious application of gamification in relation to this topic was not even mentioned in the paper, namely, the application of gamification in getting individuals to use of responsible gambling tools. The use of gamification techniques in everyday life is now widespread and a few gaming operators have already started to include such techniques as a way of facilitating use of and/or education about responsible gambling tools and practices.

One of the first gaming operators to apply gamification to promote the use of responsible gambling tools (i.e., the ‘My-Play System’ [MPS) was the *Nova Scotia Gaming Corporation* (NSGC) in Canada (now the *Nova Scotia Provincial Lotteries and Casino Corporation*). A report by Focal Research [2] noted:

“‘My-Play’, formerly called the *Informed Player Choice System (IPCS)*, was developed by *Techlink Entertainment* and allows video lottery players to use a player card on the VLT to access various responsible gaming (RG) features to manage and monitor their video lottery gambling including: account summary information detailing the amounts spent per day, per

*month, per year; live action summarizing wins losses for the current play session; options to set time and money limits; and, the ability to self-exclude or limit access to play” (p.i).*

The MPS was introduced in 2010 and was advertised heavily in NSGC gambling venues using posters and brochures. The NSGC also employed MPS representatives to provide information to players about the system, answer questions, and help them enroll on the system. Unfortunately, the number of players that enrolled to use the MPS was low and the NSGC’s own internal research indicated that players had privacy concerns as well as the lack of perceived benefit to players associated with using the MPS (i.e., most players viewed such tools as being for problem gamblers rather than themselves). Consequently, a gamification incentive system was proposed in 2011 in an attempt to encourage enrolment and usage of the player information tools. A number of gamified techniques were proposed including a (i) one-off high-value prize draw to increase MPS enrolment, and (ii) MPS player card number draw to encourage responsible gambling tool usage.

More specifically, to encourage use of the player card and MPS responsible gambling tools, 26 weekly draws for a \$1,000 VISA gift card were proposed. To be eligible for the draw, a player had to use their player card and at least one of the responsible gambling tools in the week prior to the draw. I evaluated this approach for the NSGC and concluded that any reward given to players should not encourage continued gambling [3]. For me, this is the critical difference between a traditional loyalty card program, which can encourage longer and/or more frequent gambling, and a responsible gaming strategy that encourages behavioral transparency (i.e., good awareness among players of their personal gambling behavior).

The NSGC also ran their own focus groups and there was widespread consensus that the introduction of a player information system (such as the MPS) would need to be accompanied by an extensive and well-crafted promotional strategy that included incentives, but not ones that encouraged more gambling (e.g., gift certificates for merchandise or entertainment). The NSGC subsequently offered five-dollar gift cards as an incentive to enroll on the MPS but this turned out to be unsuccessful as few players enrolled on the system and the MPS was subsequently terminated in September 2014.

A much better example of a gamified scheme was one recently introduced by the Finnish gaming operator *Veikkaus*. Their loyalty scheme rewards players when they engage in

responsible gambling practices (e.g., when players watch an online video about gambling responsibly they receive loyalty points that can be redeemed for non-gambling related items such as meals and clothing accessories). Furthermore, higher points are given in the loyalty scheme for responsible gambling-related activity than for gambling activity more generally.

Previous writings from a social responsibility perspective have noted that it is entirely appropriate for the gaming industry to advertise and market their products as long as it conforms to the relevant codes of compliance, is fact-based, does not oversell winning, and is not aimed at (or feature) minors [4]. As I noted in a paper with Jonathan Parke [5], in gambling there is a fine line between customer enhancement and customer exploitation particularly when it comes to facilitating new clientele and repeat patronage. Given the political sensitivities around the liberalization of gambling, the perception of what others think about a particular practice are sometimes given more weight than what it actually means in practice. Irrespective of whether something is introduced in a socially responsible way and/or introduced into an environment with an embedded socially responsible infrastructure, there is always the possibility of a ‘PR own goal’ that may do more financial damage in the long run.

Given there is no empirical research on the effect of incentives on vulnerable gamblers, my thoughts on this issue are speculative at best and relate to my writings on the issues of gambling bonuses. For instance, there are some academic writings on the use of bonus promotions in gambling venues but these are based on observational anecdotes rather than empirical research. In a book chapter I co-wrote with Jonathan Parke on the environmental psychology of gambling [6], we noted that the frequency of bonuses in offline gambling environments varies (depending the establishment) but can occur hourly, daily, weekly, or seasonally. Such bonuses are often used to entice the consumer in several retail environments. What makes bonuses especially appealing in a gambling environment are the obvious similarities of the structural characteristics of such bonuses and gambling events in general (e.g., risk, uncertainty, interval-ratio reinforcement etc.). Furthermore, the appeal is strengthened since gamblers feel they are ‘getting something for nothing’.

In the same chapter we also distinguished between two fundamentally different forms of bonus – the ‘general bonus’ and the ‘proportional bonus’. These may have different implications in terms of social responsibility. General bonuses are those offers that are provided irrespective of the type of player (e.g., an occasional gambler is as equally entitled to the bonus as a ‘heavy’

gambler). Proportional bonuses are those offers that depend on how long and/or frequently the player gambles with a particular gaming establishment. This means that ‘heavy’ gamblers would receive disproportionately more bonuses than an irregular player. Given that a significant proportion of the ‘heaviest’ gamblers (often referred to as ‘VIP gamblers’ by the gaming operators) may be problem gamblers, it raises questions whether rewarding people the more they spend is the most socially responsible strategy.

In relation to gamification, there are two issues that arise. The first issue is whether incentives should even be offered if they are perceived by some to be ideologically incompatible with being socially responsible. For me, giving players some kind of a bonus for using responsible gambling tools is a positive strategy for gaming operators to employ. The second issue is whether some types of incentive are less socially responsible than others. In the absence of empirical evidence, I am of the belief that general incentives target adult gamblers irrespective of play frequency and/or type, and are therefore acceptable within environments that have a good social responsibility infrastructure. I am much less comfortable with bonuses that reward the heaviest spenders. Although this model is well accepted in most commercial environments (i.e., loyalty reward schemes), gambling is a commercial activity that can result in problems for the heaviest gamblers therefore gamification strategies should be used to facilitate responsible gambling and use of responsible gambling tools rather than the amount of gambling.

As Gainsbury and colleagues [7] recently pointed out, when it comes to players engaging with responsible gambling tools, the gaming operator needs to take into account the intended target audience, the purpose, and the goal because these factors will greatly impact on engagement. They also noted that even if gamblers are informed that such tools facilitate ‘appropriate play’, the majority of players are likely to view such initiatives as being for problem gamblers rather than gamblers more generally (as was found in the MPS introduced by the NSGC). Gamification techniques could be incorporated by gaming operators to educate their clientele that harm minimization tools are provided to prevent problem gambling rather than being provided for those who already have a gambling problem. The perception by non-problem gamblers that responsible gambling tools are for problem gamblers is likely to undermine the potential efficacy of them for at-risk gamblers [8].

In 2013, the Responsible Gambling Council [9] in Ontario (Canada) carried out a focus group

study which included an examination of what problem gamblers currently undergoing treatment (N=8) thought were good incentives to get players to use responsible gambling tools. Some of the suggestions (although not all) were arguably underpinned by gamification (most using positive reinforcement [i.e., ‘the carrot’] but a few using negative reinforcement [i.e., ‘the stick’]). Among the strategies suggested were:

- Rewarding gamblers with points on their loyalty cards for participating in non-gambling activities inside and outside of gambling venues.
- Encouraging gamblers to set personal gambling limits linked to their loyalty card with no loyalty points accruing if they gamble beyond their voluntary limits.
- Have gamblers watch a video when they join a loyalty program that explains the risks associated with earning incentives while gambling.
- Offering gamblers incentives for accessing their play history (i.e., how much they win and lose).
- Offering incentives that do not require gamblers to return to the gambling venue to redeem them.
- Linking rewards to responsible gambling messaging.
- Allowing gamblers to participate in contests without having to be at the gambling venue when the winners are announced.
- Providing prevention messages following a win when gamblers are more receptive because they are in a better mood than when losing.
- Creating value for gamblers so that they want to actively use the responsible gambling tools.
- Providing incentives that are not on the gaming floor itself.
- Rewarding gamblers with (non-gambling) incentives for using limit-setting tools.
- Allowing gamblers to redeem their loyalty points for non-gambling rewards (e.g., merchandise, food, non-alcoholic beverages).
- Prohibiting the redemption of loyalty points for free play or cashback.
- Changing negative language surrounding tools (e.g., ‘responsible gambling tools’, ‘problem gambling’) to being more positive (e.g., ‘player tools’, ‘taking control’).
- Making player cards mandatory.

Changing the language around responsible gambling and associated terms might be one way alongside gamification to increase uptake of such tools. For instance, some research has indicated that the term ‘limit’ appears to be unpopular [10], and gaming operators should be offering ‘game management tools’ that assist gamblers in decisions about how much time and money they want to spend. Additionally, some researchers think that gambling loyalty schemes should be directly linked to limit-setting tools. Once the gambler’s voluntary limit has been reached, additional loyalty points are prohibited. Ultimately – and as noted above – gamblers should be rewarded for responsible gambling, rather than for the amount of gambling [11]. Such systems already exist. For instance, gamblers who have signed up for *Manitoba Liquor & Lotteries’* loyalty program (*Club Card*) can set voluntary limits on their loyalty card. Once the limit is reached, they no longer receive additional points.

Almost all gaming operators use gamified marketing techniques as a way to get (and retain) potential gamblers playing at their venues and/or on their websites. Far fewer use such techniques to help their clientele educate themselves about responsible gambling and/or to gamble more responsibly. Gaming operators have a duty of care to protect their players from developing problems. Given that gamification is used throughout many commercial and education sectors, such techniques could (and should) be used by gaming operators as a way of enabling and empowering their customers to gamble more responsibly.

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