



The Danish Gambling Authority's guide on responsible gambling

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1 Introduction

This guide is aimed at licence holders and other relevant stakeholders. The guide reviews the responsible gambling requirements placed on licence holders stated in the Danish Act on Gambling and related executive orders.

In addition to reviewing the specific rules, the guide provides guidelines to and interpretations of how licence holders more specifically can comply with the obligations about responsible gambling. In the areas where it is left to the licence holders to make an estimate, the guide contains instructions on how the rules may be met.

The guide also provides the background for responsible gambling and explanations for why responsible gambling is so crucial, when providing gambling products.

The guide is partly divided into general topics that apply to all licence holders, and under the individual sections divided according to the different gambling sectors.

The guide is specifically produced based on the executive orders for the various gambling sectors that entered into force on 1 January 2020. The executive orders contain a number of provisions that specifically relate to responsible gambling. The rules of the executive orders have been made in the light of “Agreement on new initiatives against compulsive gambling and adjustments to the gambling agreement” of 29 June 2018. The agreement was signed by the government at the time (Venstre, Liberal Alliance, and Konservative) and Socialdemokratiet, Dansk Folkeparti, Radikale Venstre og Socialistisk Folkeparti. In addition to the new rules in the executive orders, the agreement has also led to the drafting of a code of conduct for the gambling industry, which is drawn up by the gambling industry itself. In this connection, please see the Code of conduct for the gambling industry (socially responsible marketing etc.). (Only available in Danish).

The guide will be regularly updated as practices develop.

It should be noted that many marketing rules are based on the consideration for responsible gambling. The rules governing the requirements that licence holders must comply with when marketing their products are not covered by this guide. Please see the Danish Gambling Authority’s guide on sales promoting arrangements which will take effect at the same time as this guide.

It should also be noted that part of the rules and the assessment that can be taken as the basis for whether the licence holders provide gambling in a responsible manner, in some respects overlaps with the rules on prevention of money laundering and financing of terrorism. Licence holders may therefore benefit from merging the two areas and keep themselves informed in the [Danish Gambling Authority’s guidance on preventive measures against money laundering of criminal proceeds and financing of terrorism](#), when reviewing responsible gambling procedures.

The guide is also available in English on spillemyndigheden.dk/en. However, the Danish Gambling Authority emphasise that in case of any discrepancy between the original Danish text and the English translations of the guide, the Danish text shall prevail.

2 General information about responsible gambling

2.1 The legislative intent of the Danish Act on Gambling

The very purpose of the gambling legislation is that games are provided in a responsible manner. This follows from the Danish Act on Gambling section 1:

Section 1. The purpose of the law is:

- 1) to keep the consumption of gambling products at a moderate level,
- 2) to protect young people and other vulnerable persons from being exploited through gambling or developing a gambling addiction,
- 3) to protect players by ensuring that gambling is provided in a fair, responsible and transparent manner, and
- 4) to ensure public order and to prevent gambling from being used for criminal purposes.

The provision is a declaration of intent. This means that the law must be administered in consideration of the stated purposes. Thus, violation of section 1 of the Danish Act on Gambling is not in itself penalised, but the legislative intent will be included in the interpretation of the additional provisions of the gambling legislation and in any discretionary assessments. This means that when the Danish Gambling Authority assess whether a licence holder meets the various requirements in the Danish Act on Gambling, then the purpose of the Act will be included in the assessment. This assessment will be of significance for any decision made by the Danish Gambling Authority, including decisions on police reports as well as decisions on the issuance and revocation of licences. This means, among other things, that a licence to provide gambling products, covered by the Danish Act on Gambling, cannot be issued if the Danish Gambling Authority assess that the purpose of the Act is not fulfilled.

‘To protect young people and other vulnerable persons from being exploited through gambling or developing a gambling addiction’ means that licence holders are obligated to both prevent problem gambling and compulsive gambling as well as discover and help the players who may be affected by problematic gambling. For more information, please see sections 4 and 5.

‘To protect players by ensuring that gambling is provided in a fair, responsible and transparent manner’ makes demands on licence holders’ marketing, among other things. In this connection, specific requirements for the marketing of gambling products have been stipulated in the various executive orders. For more information, please read the Danish Gambling Authority’s guide on sales promoting arrangements and in [the Danish Gambling Authority’s certification programme Inspection Standards for Online Casino SCP.02.03.EN.1.2 / the Danish Gambling Authority’s certification programme Inspection Standards for Online Betting SCP.02.01.EN.1.3](#).

‘To ensure public order and to prevent gambling from being used for criminal purposes’ means that licence holders have a number of obligations to prevent money laundering and financing of terrorism. This is regulated in the anti-money laundering legislation. For more information, please read the legislation and [the Danish Gambling Authority’s guide on preventive measures against money laundering and financing of terrorism](#).

2.2 Problematic gambling

2.2.1 General information about problematic gambling

The main purpose of the Danish Act on Gambling, as discussed above, is to ensure responsible gambling. This is largely done by preventing problematic gambling. Problematic gambling is an umbrella term that denotes a spectrum of inappropriate gambling behaviour. The spectrum is typically divided into three levels with compulsive gambling being the most severe condition.

At-risk gambler – a player with an increased risk of developing a problematic gambling behaviour compared to the majority of players. An at-risk gambler gambles regularly and according to a schedule and takes more chances. However, gambling does not affect the at-risk gambler's everyday life.

Problem gambler (or high-risk gambler) – a player whose gambling causes problems, but the player still has some control. The problem gambler typically spends a lot of money and time gambling and planning his or her gambling strategy.

Compulsive gambler – a player whose gambling has serious consequences for the player's life and whose gambling has become an addiction resulting in functional impairment on various parameters.

Outside the category of people with problematic gambling behaviours are players, who gamble responsibly and balanced. This type of player can be categorised as:

The recreational gambler – a player who gambles responsibly and balanced.

According to the European diagnostic system ICD-10, WHO designates compulsive gambling as pathological gambling and defines it as: "*Frequently repeated episodes of gambling, which dominate the person's life at the expense of social, work, and family values and commitments.*" The National Board of Health uses the same definition.

Problematic gambling behaviour may develop over several years or over a short period of time. Compulsive gamblers often gamble with multiple gambling operators, and in some cases the player may already suffer from a gambling addiction established at another online operator or a land-based operator when setting up an account with an online gambling operator. Consequently, identification of problematic gambling behaviour should not be based solely on markers of escalating gambling. There can be many reasons for developing a gambling addiction. Research indicates that biological, psychological, and social factors influence this. Similarly, research indicates that gambling problems are often episodic and breaks from gambling or decreased gambling activity may thus be part of the symptom picture.

It is often seen that people with problematic gambling behaviours are attracted by games with a short time between stake and win, that is, games that are decided quickly after the stake is made.

The study “Gambling and gambling problems in Denmark 2005-2016”, conducted by VIVE (then SFI) has the following main conclusions:

- It is estimated that in 2016 there were 125,000 people with gambling problems in Denmark.
- People with gambling problems on average started gambling earlier (19-20 years) than people without gambling problems (25 years).
- People with gambling problems, to a large extent, gamble money both online as well as at land-based providers. This applies to 50 per cent of the group with a low level of gambling problems, and for 65 per cent of the group with moderate or severe gambling problems.
- People with gambling problems are more influenced by gambling advertisements than players without gambling problems.

2.2.2 Young people and problematic gambling

Young people form a particularly vulnerable group in relation to gambling, which is also emphasised in the legislative intent of the Danish Act on Gambling. The study “Gambling among young people in Denmark from 2007-2016”, conducted by VIVE (then SFI) has the following main conclusions regarding young people and gambling:

- In 2016, 40 per cent of young people under the age of 18 had gambled at some point.
- In 2016, 24 per cent of young people under the age of 18 had gambled within the past year.
- In 2016, approximately 31,600 young people exhibited risky gambling behaviours.
- 3 per cent of the 12-year-old, 12 per cent of the 15-year-old and 26 per cent of the 17-year-old boys exhibited risky gambling behaviours.
- 23 per cent of the young people who have gambled did so online. Of these, 57 per cent paid with their own debit cards, 25 per cent with their parents’ debit cards, 10 per cent with their friends’ debit cards, and 14 per cent paid by other means.
- If one has gambled online at a young age, the risk of developing a risky gambling behaviour later in life increases.

Since young people form a particularly vulnerable group, and since there are indications that an early gambling debut increases the risk of developing a problematic gambling behaviour later in life, licence holders should have a particular focus on preventing young people under 18 from gambling. This requires licence holders to pay special attention to the age of the players and have procedures that effectively ensure that young people under 18 cannot play. For example, operators of land-based betting, gambling arcades and venues where that are gaming machines must pay particular attention to checking the identification of young people who play. Similarly, land-based casinos must make sure that a player does not make use of another person’s ID.

The fact that many young people have gambled online and the many have used another person’s debit card to gamble, requires that operators of online casinos and online betting have efficient procedures to ensure that young people under 18 cannot play. In this connection, licence holders should be aware that young people under 18 can

have provided another person's civil registration number or have borrowed other person's NemID upon log-in, and licence holders should take this into account in the responsible gambling procedures, for example, licence holders should react if a debit card is used, which does not belong to the person who created the account. The licence holders should also have clear procedures for how to respond if it is discovered that a person under the age of 18 has played.

2.3 Measures to ensure responsible gambling

2.3.1 ROFUS

Register of self-excluded players (ROFUS), is a register of all players in Denmark who voluntarily have excluded themselves from gambling temporarily or permanently. If one is registered with ROFUS, one is excluded from gambling at online casinos and on online betting, and one cannot access land-based casinos in Denmark. ROFUS does not cover other gambling sectors, and therefore a player can still play other types of games even if the person in question is registered with ROFUS.

ROFUS is administered by the Danish Gambling Authority, which is responsible for keeping the register.

ROFUS works by voluntary registration. A player registers with ROFUS on ROFUS.nu if the player wishes to self-exclude from gambling temporarily or permanently.

Upon registration, the player has three options:

Gambling break – an exclusion period of 24 hours.

Temporary exclusion – an exclusion period of 1, 3, or 6 months.

Permanent exclusion – permanent exclusion unless the player requests the Danish Gambling Authority to have the exclusion removed. Removal of the exclusion is not possible before 1 year and 7 days after the time of registration.

ROFUS contains information about civil registration number on the players in the register, the date and time of exclusion and end date of a temporary exclusion.

Temporary exclusions are automatically removed when the exclusion period has expired. The exclusion is automatically removed at the exact date and time when the temporary exclusion expires. It is not possible to have a temporary exclusion removed before time and it is not possible to undo a registration.

A player who has signed up for permanent exclusion may, at the earliest of one year after the registration, request the Danish Gambling Authority to have the exclusion removed. This means that it is not possible to undo a permanent exclusion until a year, as a minimum, has passed. The player must confirm the request 7 days after the request is made to remove the exclusion. If the player has not confirmed the request to have the exclusion removed within 30 days, the request will be nullified.

A licence holder cannot register a player with ROFUS on behalf of the player, but the licence holder must inform the player of the opportunity to register with ROFUS. A licence holder that provides online casinos and online betting must also provide access to registration on all platforms where games are provided. Similarly, a land-based casino must provide access to registration on its website. This may be done by linking directly to the register from the website.

Upon creation of a new account, the licence holder must consult the register to ensure that the player is not registered with ROFUS. If a player is registered with ROFUS, the creation of the account must be rejected by the licence holder.

Each time a player logs on to his or her account with an online casino or online betting operator, the licence holder must consult ROFUS and verify that the player is not registered with ROFUS. If a player is registered with ROFUS, the player must be denied access to play. In case of permanent exclusion, the customer relationship must be terminated when the player attempts to log into the account or when the licence holder by other means become aware of the player's permanent registration with ROFUS. In case of temporary exclusion, the customer relationship should not be terminated, but the player must be denied access to play as long as the exclusion is in effect.

Each time a guest request access to a land-based casino, the casino must consult ROFUS and verify that the guest is not registered with ROFUS. If the guest is registered with ROFUS, the guest must be denied entrance to the casino. Thus, it is not sufficient that the guest is simply denied access to play.

A player registered in ROFUS on or after 1 January 2020 automatically refuses to receive marketing materials from licence holders during the exclusion period. No later than 24 hours before a licence holder releases marketing materials, the licence holder must consult the register to verify if a player is registered with ROFUS.

In addition to ROFUS, it must also be possible to self-exclude from gambling directly with the individual licence holder regardless of whether the licence holder provides online gambling or is a land-based casino.

Rules on self-exclusion can be found in:

Executive Order on online casino section 24

Executive Order on online betting section 18

Executive Order on land-based casinos section 10

For more information, please see sections 3.2.1.3.5 and 3.2.3.3.1.

2.3.2 StopSpillet (StopGambling)

On 2 January 2019, the Danish Gambling Authority launched the helpline “StopSpillet”.

StopSpillet is the Danish Gambling Authority’s helpline about compulsive gambling. StopSpillet is for anyone who needs advice and counselling about responsible gambling and compulsive gambling. StopSpillet employs professional and trained advisers, who give advice on responsible gambling and compulsive gambling.

All conversations with StopSpillet are confidential, and the Danish Gambling Authority do not disclose information from the conversations to other authorities.

Anyone who needs to talk about compulsive gambling can call. It may be people who have gambling problems themselves or relatives of someone with a gambling problem. Professionals who have questions about compulsive gambling are also welcome to call.

StopSpillet can be contacted on telephone number + 45 70 22 28 25.



3 Legal basis

3.1 The Danish Act on Gambling

As described in section 2.1, section 1 of the Danish Act on Gambling is a legislative intent which emphasises that the purpose of the gambling legislation is that gambling is provided and conducted responsibly, among other things.

Pursuant to the Danish Act on Gambling, a number of executive orders have been issued that apply to the various gambling sectors. The executive orders contain detailed rules on responsible gambling. The individual executive orders/gambling sectors are reviewed individually below.

It should be noted that, in addition to the rules of the Danish Act on Gambling and the executive orders, a number of terms and conditions that the various licence holders must comply with are also stipulated. These terms and conditions are set out in the individual licence holders' special terms and conditions.

3.2 Executive orders

3.2.1 Executive orders on online casino and online betting

The rules on online casino and online betting are laid down in two different executive orders. However, the majority of the rules on responsible gambling are the same for the two gambling sectors. Accordingly, the rules are reviewed collectively below.

It should be noted that some of the rules apply only to online casinos. In this case, it is clearly stated.

3.2.1.1 Information for the player

3.2.1.1.1 Information on the website

It follows from the Executive Order on online betting section 13(1) and Executive Order on online casino section 15(1) that:

Section 13/section 15. The licence holder's website or user interface must:

- 1) state that it is not allowed for persons under the age of 18 to participate in the games,
- 2) inform about responsible gambling and the potential harmful effects of gambling and the information must be prepared in collaboration with a treatment centre for compulsive gambling,
- 3) provide access to a self-assessment test for compulsive gambling,
- 4) provide information about and contact addresses of Danish treatment centres for compulsive gambling,
- 5) refer to the Danish Gambling Authority's helpline about responsible gambling, and
- 6) inform about the opportunity to register with the register of self-excluded players.

This information must be placed prominently on the licence holder's website, and the information must be accessible from all pages on the website.

In addition, access to the Danish Gambling Authority's website must be provided. This can be done by linking directly to the Danish Gambling Authority's website.

User interface means any media on which the licence holder provides gambling. In addition to a website, this may, for example, be an app.

"That it is not allowed for persons under 18 to participate in the games" means that a person under the age of 18 is not allowed to participate even if the person, for example, borrows a parent's account. Licence holders should be aware that this may occur and take measures to avoid this. For example, licence holders should take action if a debit card is used, which does not belong to the person who created the account. The licence holder should also have clear procedures in place on how to react, if it is discovered that a person under the age of 18 has played.

There are a number of different self-assessment tests available about compulsive gambling, including those based on a number of questions the player must answer, as well as self-assessment tests based on gambling behaviour. It is up to the licence holder to choose which type of self-assessment test they provide access to, if the self-assessment test is qualified and can, reliably, indicate if there is a gambling problem.

That information about and contact addresses on Danish treatment centres for compulsive gambling must be provided means that referring to a single treatment centre will not suffice. The Danish Gambling Authority consider it most appropriate to refer to all state funded treatment centres. An updated list is available at [Stop-Spillet.dk](#).

Reference to StopSpillet should be done in a manner that makes it easy for the player to find it. This may be done by linking directly to StopSpillet's website and by providing the telephone number of StopSpillet.

Similarly, a direct link to ROFUS may be provided. The information about ROFUS should also be provided in a way that leaves no doubt about what ROFUS is.

As before-mentioned, the information must be prominently placed on the licence holder's website or user interface and must be accessible from all pages of the website.

All necessary and relevant information for players must be in Danish.

If the licence holder is licenced to operate in Greenland, the information must be provided in both Danish and Greenlandic, and contact addresses for Greenlandic treatment centres must be provided.

3.2.1.1.2 Information on the home page of the website

On the home page of the licence holder's website or user interface, it must be stated that the licence holder holds a licence from and is supervised by the Danish Gambling Authority. This requirement is considered fulfilled when the Danish Gambling Authority's label is used. For more information, please see section 3.2.1.2.

3.2.1.1.3 Special requirement for online casinos: Clock on website

It follows from the Executive Order on online casino section 17 that:

Section 17. A clock must be provided on the licence holder's website indicating the player's time consumption per log on session on the gambling site. The clock must be easily visible to the player at all times.

Please note that this rule only applies to online casinos.

The player must be able to view the time spent on gambling. The clock must be visible to the player at all times and must not be based on the player's equipment.

That the clock must indicate the player's time consumption per log on session means that an ordinary clock to indicate time will not suffice. The watch must show the actual time spent on the website starting when the player logged in.

That the clock must be visible to the player at all times requires that the clock is actually visible to the player throughout the log on session. This means that it must not be possible to remove the clock or scroll away from it.

3.2.1.2 Labelling scheme

It follows from the Executive Order on online betting section 14 and the Executive Order on online casino section 16 that:

Section 14/section 16: The licence holder must use the Danish Gambling Authority's label on its website or user interface.

Subsection 2 The Danish Gambling Authority's label must be placed on the home page of the licence holder's website. On the additional pages of the website, the label must be easily visible to the player.

Subsection 3 The licence holder must at all times use the most recently issued version of the label that is provided by the Danish Gambling Authority. The licence holder must not change the design, proportions or colours of the label.

Subsection 4 The label must not be used in a way that gives the impression that the Danish Gambling Authority is a co-organiser or sponsor.

Subsection 5 The label must not be used by the licence holder's business partners or other parties that do not have a licence from the Danish Gambling Authority.

As previously mentioned, the user interface means any media on which the licence holder provides gambling. In addition to a website, it may, for example, be an app.

Use of the Danish Gambling Authority's labelling scheme means that the Danish Gambling Authority's label must be visible on the licence holder's website or user interface. The label must be easily visible on all pages of the website.

The main purpose of the labelling scheme is to create a safe gambling market and help the player to understand which gambling operators are licenced to provide gambling in Denmark.

The Danish Gambling Authority's label shows that the gambling operator holds a licence from the Danish Gambling Authority and that the Danish Gambling Authority supervises the licence holder.

The most recent version of the label can be downloaded from spillemyndigheden.dk. The label must be used exactly as it is, and must not be changed in any way.

Exclusively licence holders with a licence to provide gambling can use the Danish Gambling Authority's label on their websites, in their marketing materials etc. Gambling providers that use the label without a licence can incur responsibility according to the Danish Marketing Practices Act.

For more information about the Danish Gambling Authority's labelling scheme, please see [Guidelines for using the Danish Gambling Authority's label](#).

3.2.1.3 Responsible gambling

3.2.1.3.1 Deposit limit

It follows from the Executive Order on online betting section 15 and the Executive Order on online casino section 21 that:

Section 15/section 21: A player must set a deposit limit before gambling can begin. The player must be able to choose among a daily, weekly, or monthly deposit limit. The amount of the deposit limit, except for a maximum deposit limit, must not be predetermined by the licence holder.

Subsection 2 A player's request to raise a previously set deposit limit must take effect no earlier than after 24 hours.

By "deposit limit" is meant a limit for the total amount that a player can deposit on the account.

It is important that the player sets a deposit limit before gambling can begin. Therefore, setting a deposit limit should be a compulsory part of the creation of an account.

For existing customers who have not set a deposit limit, the licence holder must also ensure that the player sets a deposit limit before the player can continue gambling.

The play must, as a minimum, set one of the following deposit limits:

1. A limit for the total daily amount deposited on the account
2. A limit for the total weekly amount deposited on the account, or
3. A limit for the total monthly amount deposited on the account.

The deposit limit amounts cannot be pre-set, and a standard amount cannot be selected for the player.

The system can offer the player the opportunity to choose between amount ranges.

'That a player's request to raise a previously set deposit limit must take effect no earlier than after 24 hours' is to ensure that the deposit limit is in fact effective, and that the player cannot raise the limit regularly. Conversely, a reduction of the deposit limit should take effect immediately.

For more information, please see [the Danish Gambling Authority's certification programme Inspection Standards for Online Casino SCP.02.03.EN.1.2 / the Danish Gambling Authority's certification programme Inspection Standards for Online Betting SCP.02.01.EN.1.3](#).

3.2.1.3.2 Gambling patterns

It follows from the Executive Order on online betting section 16(1) and Executive Order on online casino section 22(1) that:

Section 16/section 22: The licence holder must be familiar with the player's gambling patterns and must take measures to prevent the player from developing a problematic gambling behaviour and a gambling addiction.

The licence holder may become familiar with the players gambling patterns by, for example, using software or by ongoing manual reviews of player history etc. A combination of several different methods can also be applied. What matters is that the procedure ensures that the licence holder actually becomes familiar with the player's gambling patterns. The method chosen must at the same time ensure that the licence holder identifies the players whose gambling patterns indicate problematic gambling behaviours, as well as the players with actual gambling addictions. For more information, please see section 4 on technical requirements.

3.2.1.3.3 Internal rules and procedures

It follows from the Executive Order on online betting section 16(2) and (3) and the Executive Order on online casino section 22(2) and (3) that:

Subsection 2 The licence holder must have written internal rules and procedures on responsible gambling to prevent problem gambling and compulsive gambling, including control and communication procedures with players who exhibit problem gambling behaviours, duty of attention and obligation to register, record keeping of information about the player's gambling behaviour and risk assessment of the player.

Subsection 3 The licence holder must keep records of the player's gambling behavior and the risk assessment of the player for 5 years.

The written internal rules and procedures on responsible gambling must include information about how the licence holder identifies problem gamblers, including compulsive gamblers. Similarly, the internal rules and procedures must describe clear guidelines and procedures for how the licence holder prevents problem gambling and compulsive gambling, including information on general, preventive measures, and how the licence holder's employees must act, when players with problematic gambling behaviours are identified. The procedures should, for example, contain clear information for the employees about which interventions to implement and when.

Similarly, the procedures must include a description of the duty of attention that employees are subjected to and information stating that it must be registered if the player exhibits problematic gambling behaviour. They must also include instructions on how to perform a risk assessment of the player. In this connection, the licence holder must have a clear description of how a risk assessment of a player is performed in relation to responsible gambling. It is necessary to have several different player categories in order for an actual risk assessment to be performed. The player categories may, for example, be based on the definitions in section 2.2, (recreational gambler, at-risk gambler, problem gambler, and compulsive gambler), but other types of categorisations may also be used which may include more or fewer types of players. What matters is that the categorisation applied takes into account the individual player's situation.

The licence holder must keep the information about the player's gambling behaviour and risk assessment for 5 years.

It is up to the licence holder to decide whether the internal rules and procedures are described in a single document or in several.

3.2.1.3.4 Training of employees

It follows from the Executive Order on online betting section 16(4) and (5) and the Executive Order on online casino section 22(4) and (5) that:

Subsection 4 The licence holder must have training and instructional programmes for relevant employees to prevent problem gambling and compulsive gambling.

Subsection 5 The licence holder must ensure that the employees involved in customer contact or analysis of players' gambling behaviours are made aware of and apply the internal rules cf. subsection 2.

"That training and instructional programmes must be for relevant employees" means that it is not necessary for the licence holder to teach all employees how to prevent problem gambling and compulsive gambling. Thus, if an employee's tasks have no relation to players and gambling behaviour, it will not be necessary to train and instruct this employee.

However, it is required that all employees who have contact with players or in any way deal with analysis of players' gambling behaviour are familiar with and apply the internal rules and procedures for responsible gambling. Consequently, it is required that, for example, all employees in customer service are instructed in and apply the internal rules and procedures for responsible gambling. In this connection, the licence holder may choose to differentiate the training and instruction between the employees according to the function and degree of contact with the players the individual employees have.

3.2.1.3.5 Self-exclusion

It follows from the Executive Order on online betting section 17(1) and Executive Order on online casino section 23(1) that:

Section 17/section 23: The licence holder must make available to the player a service that enables the player to request temporary or permanent exclusion from the licence holders gambling offers. The licence holder must ensure that the player cannot make use of the gambling offers after the player has requested exclusion.

The self-exclusion service must work in a way that ensures that the self-exclusion takes immediate effect, ensuring that the player cannot continue playing after the request of self-exclusion has been made. A service where the player must contact the licence holder, for example by email, will not suffice, as the self-exclusion period will not take immediate effect after the request has been made and the player is able to continue gambling until the request is processed.

The player must be able to self-exclude:

Short-term – with an exclusion period of 24 hours (cooling-off period).

Temporarily – with an exclusion period of 30 days as a minimum.

Permanently – with an exclusion that closes the customer's account and terminates the customer relationship.

In case of a temporary and short-term exclusion, the player's account must be deactivated during the self-exclusion period. The account may be reactivated when the self-exclusion period expires.

Since the short-term exclusion period is defined as 24 hours, it must not be possible to self-exclude for less than 24 hours. Similarly, it must not be possible to self-exclude for a time period between 24 hours and 30 days, as the temporary exclusion period must be a minimum of 30 days. In contrast, it should be possible for the player to choose a temporary exclusion period that lasts more than 30 days.

In case of permanent exclusion, the account, as mentioned above, must be closed and the customer relationship terminated. No earlier than 1 year after the closing of the account may the player be registered as a new customer again. The licence holder must therefore store the information about a player's self-exclusion, so that the customer cannot register as a new customer after a short time. The registration of the player's exclusion should be done via the customer's civil registration number or similar to ensure that the customer cannot create a new account, for example by entering a different e-mail address than the previously registered e-mail address.

A licence holder may establish its own rules that require that more than 1 year should pass before a permanently self-excluded player can create a new account.

A licence holder must inform a player who has self-excluded from the licence holders gambling services about counselling and treatment offers for compulsive gamblers at a Danish treatment centre. If the player is from Greenland, the licence holder must inform the player about counselling and treatment offers for compulsive gambling at a Greenlandic treatment centre. The information must be provided to the player whether the player has opted for short-term, temporary or permanent self-exclusion.

3.2.1.3.6 Special requirement regarding bonus offers

In relation to responsible gambling, the licence holder must exercise special caution when awarding bonus offers and when using other sales promoting arrangements.

It follows from the Executive Order on online betting section 23(2) and the Executive Order on online casino section 30(2) that:

Subsection 2 A player's inactivity with a licence holder must not be a selection criterion when awarding sales promoting offers.

Thus, bonuses must not be awarded based on a player's inactivity. At the same time, the licence holder's attention should be sharpened if a player requests to receive bonuses, as this may indicate that the player feels a need to play but cannot afford it.

For more information on this, please see the Danish Gambling Authority's guide on sales promoting arrangements.

3.2.1.3.7 High roller customers

Some licence holders offer particularly favourable conditions for high roller customers or VIP customers, who are offered special bonuses, gifts, participation in VIP events etc. If the licence holder makes use of this, it makes special demands on the licence holder to be aware of signs of danger in relation to responsible gambling, even if the player is a valued customer. The licence holder must actively ensure that people with problematic gambling behaviour are not made part of the licence holder's customer loyalty programmes and other marketing arrangements.

3.2.2 Executive Order on land-based betting

3.2.2.1 Information for the player

It follows from the Executive Order on land-based betting section 3(1) that:

Section 3. At the point of sale, it must:

- 1) state that it is not allowed for persons under the age of 18 to participate in the games,
- 2) inform about responsible gambling and the potential harmful effects of gambling and the information must be prepared in collaboration with a treatment centre for compulsive gambling,
- 3) provide information about and contact addresses of Danish treatment centres for compulsive gambling, and
- 4) state that the licence holder has a licence from and is supervised by the Danish Gambling Authority.

By "the point of sale" is meant any counter from where it is possible to buy gambling products.

The information must take up a prominent place at the point of sale and the player must be presented with the information before participation in the game. The licence holder must ensure that the information in fact does take up a prominent place. If it is chosen that the information should appear on the counter at the point of sale, it must be ensured that the information is not covered with good or similar. The requirement that the player

must be presented with the information before participating in the game means that it will not suffice to provide the information together with, for example, the coupon.

A licence holder with a licence to provide gambling in Greenland must provide the information in both Danish and Greenlandic, and contact addresses on Greenlandic treatment centres must be provided.

The requirement that people under the age of 18 are not allowed to participate in the games make demands on the licence holder to instruct the employees at the point of sale in checking the identification of young people who wish to gamble, to effectively ensure that young people under the age of 18 do not have access to gambling activities.

That information about and contact addresses on Danish treatment centres for compulsive gambling must be provided means that referring to a single treatment centre will not suffice. The Danish Gambling Authority consider it most appropriate to refer to all state funded treatment centres. Alternatively, there may be referred to the treatment centres nearest the point of sale. An updated list of state funded treatment centres is available at [Stop-Spillet.dk](#).

3.2.2.2 Labelling scheme

It follows from the Executive Order on land-based betting section 4 that:

Section 4. The Danish Gambling Authority's labelling scheme must be used at the point of sale. The label must be easily visible to the player.
Subsection 2 The licence holder must at all times use the most recently issued version of the label that is provided by the Danish Gambling Authority. The licence holder must not change the design, proportions or colours of the label.

Subsection 3 The label must not be used in a way that gives the impression that the Danish Gambling Authority is a co-organiser or sponsor.
Subsection 4 The label must not be used by the licence holder's business partners or other parties that do not have a licence from the Danish Gambling Authority.

'That the Danish Gambling Authority's labelling scheme must be used' means that the Danish Gambling Authority's label must be visible to the player at the point of sale.

The main purpose of the labelling scheme is to create a safe gambling market and help the player to understand which gambling operators are licenced to provide gambling in Denmark.

The Danish Gambling Authority's label shows that the gambling operator holds a licence from the Danish Gambling Authority and that the Danish Gambling Authority supervises the licence holder.

The most recent version of the label can be downloaded from [spillemyndigheden.dk](#). The label must be used exactly as it is and must not be changed in any way.

Exclusively licence holders with a licence to provide gambling can use the Danish Gambling Authority's label on their websites, in their marketing materials etc. Gambling providers that use the label without a licence can incur responsibility according to the Danish Marketing Practices Act.

For more information about the Danish Gambling Authority's labelling scheme, please see [Guidelines for using the Danish Gambling Authority's label](#).

3.2.3 Executive Order on land-based casinos

3.2.3.1 Information for the player

3.2.3.1.1 Information at the entrance to the casino

It follows from the Executive Order on land-based casinos section 12(1) that:

Section 12. The casino must in a prominent place at the entrance area in writing:

- 1) state that it is not allowed for people under the age of 18 to have access to the casino,
- 2) provide information about responsible gambling and the potentially harmful effects of gambling,
- 3) provide contact addresses on Danish treatment centres for compulsive gambling,
- 4) inform about the casino's house rules, which means the rules for accessing and staying at the casino,
- 5) state that tipping employees at the casino is voluntary,
- 6) inform about the opportunity and consequences of self-excluding from gambling at the casino,
- 7) inform about the opportunity to register with the register of self-excluded players,
- 8) inform about the Danish Gambling Authority's helpline about responsible gambling, and
- 9) inform about the casino's processing of complaints, including where people may direct a complaint.

The information must be provided in both Danish and English.

'That the information must be provided at a prominent place at the entrance area' is to ensure that the visitor is presented with the information before entering the casino. The licence holder must ensure that the information is in fact given a prominent place at the entrance area and is clearly visible.

The requirement that people under the age of 18 are not allowed to enter the casino requires that employees at the entrance area be careful to check the identity of the visitors. The extent of identification must always be determined based on a risk assessment. What matters is that the casino is certain that the guest is the person they

are claiming to be. In this connection, the employees must pay special attention to the use of self-service scanners to ensure that people under the age of 18 or people registered with ROFUS do not have access to the casino even though self-service scanners are used. Regardless of the type of admittance control used, the licence holder is at all times responsible for ensuring that due registration and verification of the guest's identity is performed.

The information about responsible gambling and the potentially harmful effects of gambling must be prepared in collaboration with a treatment centre for compulsive gambling.

That information about and contact addresses on Danish treatment centres for compulsive gambling must be provided means that referring to a single treatment centre will not suffice. The Danish Gambling Authority consider it most appropriate to refer to all state funded treatment centres. Alternatively, there may be referred to the treatment centres nearest the casino. An updated list of state funded treatment centres is available at [Stop-Spillet.dk](#).

The information about ROFUS should be disclosed in a way that leaves no doubt about what ROFUS is.

Reference to StopSpillet should be done in a manner that makes it easy for the player to find it. This may be done, for example, by providing the telephone number of StopSpillet.

In addition to providing the information at a prominent place at the entrance area, the casino may conveniently provide some of the information in a form that can be handed out or taken by the guests. It may be flyers with information about contact addresses on Danish treatment centres, the telephone number for StopSpillet, a guide to self-exclusion with ROFUS and similar.

3.2.3.1.2 Information on the casino's website

It follows from the Executive Order on land-based casinos section 14(1) that:

Section 14. The following must be stated on the casino's website:

- 1) That people under the age of 18 are not allowed entrance to the casino.
- 2) That the casino is licenced and supervised by the Danish Gambling Authority and access to the Danish Gambling Authority's website must be provided.
- 3) Information prepared in collaboration with a treatment centre for compulsive gambling about responsible gambling and the potentially harmful effects of gambling.
- 4) Information about the opportunity to register with the register of self-excluded players and there must be provided access to registration at the Danish Gambling Authority's website.
- 5) Access to a self-assessment test for compulsive gambling.
- 6) Information about and contact addresses on Danish treatment centres for compulsive gambling.
- 7) Information about the Danish Gambling Authority's helpline about responsible gambling.
- 8) Information about the casino's processing of complaints.

The information must be provided in both Danish and English.

Access to the Danish Gambling Authority's website can be done by linking directly to the Danish Gambling Authority's website.

Similarly, there may be provided a direct link to the registration page at ROFUS on the Danish Gambling Authority's website to meet the requirement of providing access to registration in the register. A direct link to the registration form should be provided, not only a link to the home page of the Danish Gambling Authority's website. The information about ROFUS should also be disclosed in a way that leaves no doubt about what ROFUS is.

There are a number of different self-assessment tests available about compulsive gambling, including those based on a number of questions the player must answer, as well as self-assessment tests based on gambling behaviour. It is up to the licence holder to choose which type of self-assessment test they provide access to, if the self-assessment test is qualified and can, reliably, indicate if there is a gambling problem.

That information about and contact addresses on Danish treatment centres for compulsive gambling must be provided means that referring to a single treatment centre will not suffice. The Danish Gambling Authority consider it most appropriate to refer to all state funded treatment centres. An updated list is available at Stop-Spillet.dk.

Information about StopSpillet should be done in a manner that makes it easy for the player to find it. This may be done by linking directly to StopSpillet's website and by providing the telephone number of StopSpillet. It is also required that information about StopSpillet service is provided. Thus, it will not suffice to solely refer to StopSpillet.

All information must have a prominent place at the casino's website and must be accessible from all pages of the website.

3.2.3.2 Labelling scheme

It follows from the Executive Order on land-based casinos section 16 that:

Section 16. The casino must use the Danish Gambling Authority's labelling scheme at the entrance area and on its website.

Subsection 2 The Danish Gambling Authority's label must be easily visible to the player at the entrance area and at the entrance to adjacent premises and must be placed in the left or right upper corners of the home page of the casino's website. On the additional pages of the website, the label must be easily visible to the player.

Subsection 3 The casino must at all times use the most recently issued version of the label that is provided by the Danish Gambling Authority. The casino must not change the design, proportions or colours of the label.

Subsection 4 The label must not be used in a way that gives the impression that the Danish Gambling Authority is a co-organiser or sponsor.

Subsection 5 The label must not be used by the casino's business partners or other parties that do not have a licence from the Danish Gambling Authority.

That the Danish Gambling Authority's labelling scheme must be used' means that the Danish Gambling Authority's label must be visible to the player at the casino's entrance area and on the casino's website.

The main purpose of the labelling scheme is to create a safe gambling market and help the player to understand which gambling operators are licenced to provide gambling in Denmark.

The Danish Gambling Authority's label shows that the gambling operator holds a licence from the Danish Gambling Authority and that the Danish Gambling Authority supervises the licence holder.

The most recent version of the label can be downloaded from spilemyndigheden.dk. The label must be used exactly as it is and must not be changed in any way.

It is exclusively the casino itself, which is licenced to provide gambling, that can use the Danish Gambling Authority's label at the casino, in its marketing materials etc. This also means that the casino's business partners cannot use the label. Gambling providers that use the label without a licence can incur responsibility according to the Danish Marketing Practices Act.

For more information about the Danish Gambling Authority's labelling scheme, please see [Guidelines for using the Danish Gambling Authority's label](#).

3.2.3.3 Responsible gambling

3.2.3.3.1 Self-exclusion

It follows from the Executive Order on land-based casinos section 9(1) that:

Section 9. The casino must upon request from a person register the identification information mentioned in section 3, including information on the person's self-exclusion from the casino and must be denied access to the casino at the entrance.

Thus, it must be possible to self-exclude from a casino. If a person requests to be excluded, the casino must register that the person has self-excluded from the casino. The information that must be registered about the person is name, address, and civil registration number or similar information if the person does not have a civil registration number.

If a visitor who has self-excluded from the casino attempts to enter the casino, the person must be denied admittance at the entrance to the casino. Even if the visitor does not intend to gamble at the casino, the casino must not allow the person access, and the casino is obligated to have in place sufficient procedures to ensure that a person who has requested self-exclusion cannot enter the casino. As stated in section 3.2.3.1.1, special measures must be taken if the casino makes use of self-service scanners.

Self-exclusion can only be requested on one's own behalf. However, it must be possible to make the request in writing and by approaching the casino in person. The person in question must sign and date a document stating the wish to self-exclude. It must be possible to sign the statement at the entrance to the casino so the person may avoid entering the casino.

The player must have the opportunity to self-exclude:

Temporarily – with an exclusion period of no less than 30 days.

Permanently – an exclusion that can first be removed 1 year after the exclusion has taken effect at the earliest.

In case of a permanent exclusion, the person may request to have the self-exclusion removed at any time, however no earlier than after the 1-year minimum duration period. It must be possible to request having the exclusion removed in writing and by approaching the casino in person. Due to the obligation to delete data, the self-exclusion registration must be deleted five years after the registration regardless of whether it has been requested that the exclusion be removed. This means that a permanent exclusion from a land-based casino is in fact only effective for 1 to 5 years.

If a person has self-excluded, the casino must inform the person about counselling and treatment offers for compulsive gamblers at a Danish treatment centre and the opportunity to register with the Danish Gambling Authority's register of self-excluded players. The information must be provided to the player whether the player has opted for temporary or permanent self-exclusion.

3.2.4 Executive Order on gaming machines

3.2.4.1 Information for the player

3.2.4.1.1 In gambling arcades

It follows from the Executive Order on gaming machines section 17 that:

Section 17. At the entrance to a gambling arcade the following information must be easily visible to the player:

- 1) that people under the age of 18 are not allowed access to a gambling arcade, and
- 2) a reference to the Danish Gambling Authority's helpline for responsible gambling.

'That the information must be placed at the entrance and be easily visible to the player' is to ensure that the player is presented with the information before entering the gambling arcade. The licence holder must ensure that the information has a prominent place and is clearly visible.

'That people under the age of 18 are not allowed access to the gambling arcade' requires that the staff is particularly careful to verify the identification of young people who wish to enter the arcade to effectively ensure that people under the age of 18 do not have access to participate in gambling activities.

Reference to StopSpillet should be done in a manner that makes it easy for the player to find it. This may be done by providing the telephone number of StopSpillet.

As a supplement, the arcade may conveniently provide some of the information in a form that can be handed out or taken by the players. It may be flyers with information about StopSpillet.

3.2.4.1.2 In restaurants, cafes and bars with gaming machines

It follows from the Executive Order on gaming machines section 18 that:

Section 18. Near gaming machines installed in restaurants, cafes and bars, it must be clearly visible to the player:

- 1) that persons under the age of 18 are not allowed to gamble on gaming machines and
- 2) a reference to the Danish Gambling Authority's helpline about responsible gambling.

The information disclosing that persons under the age of 18 cannot gamble on gaming machines and a reference to StopSpillet must be clearly visible to the player from all gaming machines in the restaurant, café or bar.

'That people under the age of 18 are not allowed to gamble on gaming machines' requires that the staff at restaurants, cafes and bars are particularly careful to verify the identification of young people who gamble on the gaming machines to effectively ensure that people under the age of 18 do not have access to participate in gambling activities.

Reference to StopSpillet should be done in a manner that makes it easy for the player to find it. This may be done by providing the telephone number of StopSpillet.

As a supplement, restaurants, cafes and bars may conveniently provide some of the information in a form that can be handed out or taken by the players. It may be flyers with information about StopSpillet.

3.2.4.2 Labelling scheme

It follows from the Executive Order on gaming machines section 19 that:

Section 19. The Danish Gambling Authority's labelling scheme must be used at the entrance to a gambling arcade and near gaming machines installed at restaurants, cafes and bars. The Danish Gambling Authority's label must be clearly visible to the player.

Subsection 2 The licence holder must at all times use the most recently issued version of the label that is provided by the Danish Gambling Authority. The licence holder must not change the design, proportions or colours of the label.

Subsection 3 The label must not be used in a way that gives the impression that the Danish Gambling Authority is a co-organiser or sponsor.

Subsection 4 The label must not be used by the licence holder's business partners or other parties that do not have a licence from the Danish Gambling Authority.

By 'near to gaming machines' is meant that the Danish Gambling Authority's label must be clearly visible to the player from all gaming machines.

'That the Danish Gambling Authority's labelling scheme must be used' means that the Danish Gambling Authority's label must be clearly visible to the player at the entrance to a gambling arcade or near gaming machines installed in restaurants, cafes and bars.

The main purpose of the labelling scheme is to create a safe gambling market and help the player to understand which gambling operators are licenced to provide gambling in Denmark.

The Danish Gambling Authority's label shows that the gambling operator holds a licence from the Danish Gambling Authority and that the Danish Gambling Authority supervises the licence holder.

The most recent version of the label can be downloaded from spillemyndigheden.dk. The label must be used exactly as it is and must not be changed in any way.

Exclusively licence holders with a licence to provide gambling can use the Danish Gambling Authority's label at the gambling arcade/restaurant, cafe or bar with gaming machines. It also means that business partners cannot use the label. Gambling providers or others that use the label without a licence can incur responsibility according to the Danish Marketing Practices Act.

For more information about the Danish Gambling Authority's labelling scheme, please see [Guidelines for using the Danish Gambling Authority's label](#).

3.2.5 Special requirements regarding online bingo via television

It follows from the Executive Order on online casino section 18 that:

Section 18. Licence holders that offer online bingo via television and that do not have a website must provide the player with the information mentioned in section 14(1)(1) and section 15(1) and (3) by other means.

Subsection 2 In connection with the broadcast, the licence holder must inform the player of the minimum age cf. section 15(1)(1) and of the licence and the supervision cf. section 15(3) including where additional information as stated in sections 14 and 15 can be found.

Subsection 3 Section 17 does not apply to online bingo offered via television.

This means that operators who offer online bingo via television and who do not have a website must make available to the player the following information by other means:

- 1) that people under the age of 18 are not allowed to participate in the gambling activities,
- 2) information about responsible gambling and the potentially harmful effects of gambling, and the information must be prepared in collaboration with a treatment centre for compulsive gambling,
- 3) access to a self-assessment test for compulsive gambling,
- 4) information about and contact addresses on Danish treatment centres for compulsive gambling,
- 5) a reference to the Danish Gambling Authority's helpline about responsible gambling,
- 6) information about the opportunity to sign up to the register of self-excluded players,
- 7) that the licence holder holds a licence from and is supervised by the Danish Gambling Authority.

The above information must be available in Danish.

The information that the licence holder must provide in connection with the broadcast is:

- 1) the minimum age of 18 years,
- 2) that the licence holder is licenced and supervised by the Danish Gambling Authority,
- 3) where to find the additional information provided by the licence holder.

The requirement of a clock indicating the time spent by the player does not apply to online bingo via television.

For a more specific review of the requirements for the specific information, please see section 3.2.1 on online casino and online betting.

3.2.6 Executive Order on charity lotteries

There is no minimum age for participation in charity lotteries.

It follows from the Executive Order on charity lotteries section 9 that:

Section 9. The organiser must use the Danish Gambling Authority's labelling scheme when holding and marketing a charity lottery cf. section 2 on its website or user interface, at the entrance to the point of sale and on other relevant material etc.

Subsection 2 The label must be clearly visible to the participant.

Subsection 3 Subsections 1 and 2 do not apply to lottery tickets.

Subsection 4 The organiser must at all times use the most recently issued version of the label that is provided by the Danish Gambling Authority. The licence holder must not change the design, proportions or colours of the label.

Subsection 5 The label must not be used in a way that gives the impression that the Danish Gambling Authority is a co-organiser or sponsor.

Subsection 6 The label must not be used by the organiser's business partners or other parties that do not have a licence from the Danish Gambling Authority.

Use of the Danish Gambling Authority's labelling scheme means that the Danish Gambling Authority's label must be visible at the point of sale and on all relevant material. If a website or user interface is used, the Danish Gambling Authority's labelling scheme must also be visible at such media. User interface means any media on that provide information about the charity lottery. In addition to a website, it may, for example, be an app.

The main purpose of the labelling scheme is to create a safe gambling market and help the player to understand which gambling operators are licenced to provide gambling in Denmark.

The Danish Gambling Authority's label shows that the gambling operator holds a licence from the Danish Gambling Authority and that the Danish Gambling Authority supervises the licence holder.

The most recent version of the label can be downloaded from spilemyndigheden.dk. The label must be used exactly as it is, and must not be changed in any way. This means that the label must be used in the appointed colours, and must not be printed in, for example, black/white.

Exclusively licence holders with a licence to provide gambling can use the Danish Gambling Authority's label at points of sale, in their marketing materials etc. Gambling providers that use the label without a licence can incur responsibility according to the Danish Marketing Practices Act.

For more information about the Danish Gambling Authority's labelling scheme, please see [Guidelines for using the Danish Gambling Authority's label](#).

3.2.6.1 Requirements regarding lotteries

Special rules on responsible gambling have not been provided regarding lotteries. However, rules on this may be stated in the terms and conditions for the individual licences.

The minimum age for participation in ordinary lotteries is 16 years.

4 Technical requirements

4.1 Online casino and online betting

4.1.1 Background to technical requirements

As already reviewed in section 3.2.1.2 it follows from the Executive Order on online betting section 16(1)(1) and executive order on online casino section 22(1) that:

Section 16/section 22. The licence holder must be familiar with the player's gambling patterns and must take measures to prevent the player from developing a problematic gambling behaviour and a gambling addiction.

Thus, the licence holder has a special duty to pay attention to ensure the prevention of the player developing a problematic gambling behaviour and a gambling addiction.

It follows from the preparatory works to the Danish Act on Gambling particularly regarding online gambling that online provision of gambling activities further the need for extensive consumer protection as these games provide constant access to gambling activities with no personal contact between the player and the licence holder and players can quickly lose large amounts of money and develop problematic gambling behaviours. Online provision of gambling activities thus furthers the need for increased consumer protection compared to provision of land-based gambling activities.

On the other hand, it is also emphasised that the technology in the online sector allows for initiatives to prevent the development of problematic gambling. Below is a framework for how the duty of attention, according to the Danish Gambling Authority's assessment, can be met.

As a result of the duty of attention, the licence holder is required to identify players whose gambling patterns indicate problematic gambling behaviour.

4.1.2 Construction of statistical models

4.1.2.1 Identification of players with problematic gambling behaviours

The ongoing characterisation of a player's gambling patterns can be performed by professionals with relevant backgrounds who perform a manual review of the gambling history. Software can also be used to analyse gambling patterns using statistical models. Finally, it is possible to use a combination of a manual approach and statistical analysis or to use a third method. What matters is that the method is suitable for identifying problematic gambling behaviour.

There are no clear and general objectives for how to identify problematic gambling behaviour in gambling data and problematic gambling can occur differently across players and types of gambling activities. Therefore, to

comply with the duty of attention, the licence holder should use methods that are adapted to the individual licence holder's data.

To develop procedures or methods for identifying players with problematic gambling behaviours, it may be necessary to have professionals or statistical models learn from examples of gambling data. I.e. professionals can be authorised psychologists, doctors or others healthcare professionals with experience within the field of compulsive gambling.

Compulsive gambling is, as described in section 2.2, a clinical condition and assessment of whether a player meets the diagnosis criteria requires partly relevant medical background and partly information beyond gambling data. Thus, the license holder neither has the obligation nor the opportunity to assess players in any clinical sense.

Instead, it is permitted to use indirect objectives (surrogate objectives) for problematic gambling behaviour to select examples of gambling patterns indicating unproblematic or problematic gambling behaviours. This may include self-exclusion, self-assessment tests, or assessments of gambling data performed by professionals with relevant backgrounds.

As reviewed in section 2.2.1, in 2016 it was estimated that 125,000 persons in Denmark had gambling problems. The share of players with problematic gambling behaviour may be assumed to vary between player segments and types of gambling activities, but in general, it is expected that the majority of the players' gambling patterns do not indicate problematic gambling behaviour.

A model that in all cases identify the players' gambling patterns as unproblematic will be correct in more than 90 per cent of cases, but will be useless in identifying players who show signs of problematic gambling. Methods for analysing gambling patterns should therefore be arranged so that both players with problematic and unproblematic gambling behaviours can be identified with a reasonable success rate.

In the design of the models, it is permitted to explicitly differentiate between several levels of problematic gambling behaviour. This enables more targeted initiatives towards different types of players.

4.1.2.2 Selection of markers

Based on the licence holder's data set, the research literature can be scanned to identify parameters that quantify and qualify relevant behavioural markers. They may be:

- Money spent** – how much money are gambled?
- Time spent** – how much time is spent gambling per day?
- Time of day** – does gambling occur at certain times of the day?
- Type of gambling activity** – are the majority of games played decided quickly?
- “Chasing losses”** – does the gambling pattern indicate that the player attempt to win back losses?
- Deposit limit** – does the player often change the deposit limit?
- Objective information** – the player’s age/gender?
- Frequent transactions** – does the player often withdraw money from the account that are quickly deposited again?
- Willing to take risks** – does the player take big risks when gambling?

The above is only examples of parameters that can be used. Thus, other and more criteria than those mentioned can be used, and there is no specific requirement for how many criteria to use. However, a single criterion will not suffice, and the criteria must be combined.

Interactions between markers should also be taken into account, insofar as this is important for the accuracy of the model. This means that the interpretation of each marker should depend on the other markers and not stand alone.

4.1.2.2.1 *Money spent*

According to the anti-money laundering legislation, a licence holder must have internal written rules that define high roller customers and have an understanding of the sources of their high roller customers’ income or wealth. The Danish Act on Gambling contains no corresponding rules, but a licence holder may advantageously use the information and knowledge that must be collected according to the anti-money laundering legislation to access the customer in relation to responsible gambling. This means that although there is no legal requirement for a licence holder to investigate whether a player can afford to spend the amounts gambled, the licence holder may use the knowledge gained from investigations made in connection with the anti-money laundering obligations to access whether the player gambles more than he can afford.

It should be noted that licence holders must ensure that the processing of personal data is in accordance with the regulations of the general data protection regulation.

When assessing whether a player is a high roller customer, the money spent by the player may be compared to the money spent by an average player. According to numbers obtained by the Danish Gambling Authority, the average player's amount spent on gambling in 2018 was DKK 2,012 per year.

Below is the distribution of the gross gaming revenue (GGR) per Dane over 18 years.

Fordeling af BSI pr. dansker (18+)

2.200

2.100

2.000

1.900

1.800

1.700

2012

2014

2016

2018

The latest numbers can be found on spillemyndigheden.dk.

Another factor that may be included in the assessment is the average Dane's income and disposable amount for spending.

The licence holder may also include its own experiences with a typical/average player's amount spent with the licence holder.

It is emphasised that a person who falls under the licence holder's definition of a high roller customer does not necessarily have a problematic gambling behaviour. Conversely, a player with a problematic gambling behaviour is not necessarily a high roller customer. It will always be individual, how much a player can afford to gamble. Similarly, there will always be variations in when gambling interferes with the player's life in a disruptive way. Therefore, a compulsive gambler may be able to afford gambling, yet it may, in other ways, interfere with the player's life in a disruptive manner.

Thus, the amount spent on gambling can never be the only marker a licence holder uses to comply with its obligation to offer responsible gambling.

4.1.2.3 Selection of statistical models

It is permitted to use methods where markers are not explicitly defined, for example artificial neural networks. However, it should be noted that such a model must have access to the data that enables implicit representation

of the markers that are presumed to be relevant. That is, the model itself has the ability to identify the connections that relevant markers express, although the outcome may not necessarily be otherwise explained or identified than by the use of machine learning.

There is no requirement as to whether regression or classification models are used.

Regression model – characterised by assigning a score and ranking on a scale.

Classification models – characterised by categorisation.

Thus, using a regression model, each player will be assigned a score and ranked on, for example, a scale from 1-10 depending on an assessment of how problematic the player's gambling is.

Using a classification model, each player will be categorised, for example as a recreational gambler, at-risk gambler, problem gambler or compulsive gambler.

4.2 Land-based games

As mentioned in the section above, the main reason behind the technical requirements for online casino and online betting is that these types of gambling activities involve no personal contact between the player and the licence holder.

Land-based gambling activities do involve personal contact between the licence holder and the player, and therefore, the requirements of technical measures to detect and identify problematic gambling behaviour do not apply.

In contrast, the lack of technical requirements and the personal contact make other demands on providers of other types of games, including that the licence holder and its employees pay special attention to behaviour that indicates gambling problems.

When preparing the procedures for the duty of attention in relation to responsible gambling, the licence holder may seek inspiration in its procedures for prevention of money laundering, since the duty of attention in relation to responsible gambling in some areas will coincide with obligations laid down in the anti-money laundering legislation. For example, the size of deposits and withdrawals and the player's behaviour is of interest both in connection with money laundering and with responsible gambling. Regarding the gambling sectors that are exempted from the Anti-Money Laundering Act, inspiration may be found in the obligations to report, which applies to all gambling operators. For more information, please see [the Danish Gambling Authority's guidance on preventive measures against money laundering and financing of terrorism](#).

It should be noted that licence holders must ensure that the processing of personal data is in accordance with the regulations of the general data protection regulation.

5 Measures and interventions

5.1 Online casino and online betting

As a result of the duty of attention in the executive orders on online casino and online betting, and the terms and conditions that may be stated in the licence holder's licence, the licence holder is obligated to take appropriate measures and intervene against players whose gambling patterns indicate a need for this.

To prevent and hinder problematic gambling is considered two independent objectives. It is not sufficient to merely intervene against players who show signs of being a problem gambler or a compulsive gambler. Preventive intervention should also be targeted at-risk gamblers, to prevent a low degree of problem gambling to developing into compulsive gambling.

Furthermore, as part of the general responsibility measures, preventive measures should be taken against all players.

Preventive measures may both be passive and active.

Passive measures – all measures taken by the licence holder to prevent and hinder problematic gambling. The measures are not specifically aimed at the individual player.

Active measures – interventions that are aimed at the individual player or a group of players on the basis of his or their specific and current gambling behaviour.

The licence holder should take an interest in the effect of the measures and should evaluate and develop its responsibility measures regularly. The licence holder should also regularly evaluate whether the players respond to the measures and should, in a broader sense, be interested in the effect of the measures aimed at the players. The licence holder cannot be said to prevent and hinder problem gambling if the licence holder is aware that the measures do not affect the players.

5.1.1 Passive measures

Passive measures may include when a licence holder on its website or user interface must inform about responsible gambling and the potentially harmful effects of gambling, refer to the Danish Gambling Authority's helpline about responsible gambling (StopSpillet) and similar. It may also include pop-ups or standardised e-mails about responsible gambling that are sent to all players regardless of time and money spent or gambling behaviour.

5.1.2 Active measures

Active measures are interventions aimed directly at the player based on his specific and current behaviour. This may include pop-ups, e-mails or phone calls, to send the player a report of the player's gambling behaviour compared to other players with the licence holder and similar.

The type of intervention must be relevant to the individual player and should be adapted to the player's current gambling pattern. Type and extent of interventions should correspond to the player's level of problematic gambling behaviour.

In the dialogue with the player, it should be considered to present the player with a summary of his gambling history with special focus on the behavioural characteristics that are problematic.

The player should actively be made aware of responsible gambling initiatives, for example deposit limits and self-exclusion, and information about help offers, including StopSpillet, ROFUS and treatment offers. This may be done both in writing and orally.

It is clarified that the obligation to make active interventions can be met although the licence holder deviates from an otherwise standardised intervention program if the player responds inappropriately to the interventions. A player who responds dismissively and declines contact should not necessarily be treated in the same way as a player who responds more positively. On the contrary, it may be more appropriate to adapt and target interventions as best as possible to the specific player.

Thus, the obligation is not necessarily met simply because the licence holder has used its ordinary intervention procedures.

A player's request not to be contacted or disturbed can never take away an operator's obligation to prevent and hinder problematic gambling. The obligation does not lapse because the player considers himself to be fine and decline further contact.

A player's own claim that he does not have a gambling problem may not automatically be trusted. A player who has a gambling problem may not yet have acknowledged the problem. Similarly, the player may be so desperate to gamble that the player refuses having a problem for fear of being excluded from gambling.

The licence holder may therefore seek information about the player by other means. For example, by searching on the customer's name on the Internet. If the player uses social media, this will often provide a picture of the player's financial and social situation. There may also be other information indicating that the player is a vulnerable person or similar.

Self-imposed restrictions such as deposit limits set by the player is most often preferred over forced exclusion. If an operator immediately closes the player's account without taking other measures, the player will simply be able to continue gambling with another operator. However, forced exclusion should take place if the player does not respond to the interventions.

It is recommended to clarify whether the various players fall into segments that require different types of intervention. The operator should have and make use of different types of interventions.

As reviewed in section 3.2.1.3.4, it is a requirement that the licence holder's employees are trained in ensuring responsible gambling among players.

5.2 Land-based games

As stated in section 4.2 licence holders of other types of games than online casino and online betting have procedures regarding responsible gambling, to make employees aware of behaviour that indicates problematic gambling.

With the duty of attention comes an obligation to exercise responsibility towards the players who exhibit signs of danger. This may be done by having a conversation with a player who gambles large amounts of money, exhibits aggressive behaviour when losing a game and requests to gamble on credit or similar. Written information about StopSpillet and treatment offers may also be provided.

6 Outsourcing and third party assistance

The licence holder may choose to entrust a third party with the analysis of gambling patterns.

However, it is always the one who establishes the customer relationship – that is the licence holder – who is responsible for ensuring that the rules and obligations relating to responsible gambling are complied with.

If a licence holder uses assistance from a third party, the licence holder must ensure that the third party meets the requirements for record keeping and that the processing of personal data is carried out in accordance with the rules of the general data protection legislation.

7 Responses in case of lack of compliance

7.1 Penalty

As described in section 2 on the legislative intent of the Danish Act on Gambling, the rules on responsible gambling are the very purpose of the gambling legislation and mean that all other interpretations of the legislation must be based on responsible gambling. This does not provide an opportunity to independently punish the licence holder for failing to provide responsible gambling activities.

However, it follows from the Danish Act on Gambling section 59(5)(3) that:

Subsection 5 Unless a more severe penalty is caused in accordance with other legislation, any person who intentionally or with gross negligence
(...)
3) violates conditions set in accordance with section 32.

This means that if a licence holder violates the conditions to provide gambling responsibly, which may be stated in the conditions for the licence, it may be punishable by fine.

It may also be punishable by fine if the rules on responsible gambling stipulated in the executive orders are violated.

In practice, the Danish Gambling Authority will report a licence holder to the police, who is subsequently responsible for any further investigations and prosecution.

The Danish Gambling Authority report to the police violations in cases that involve gross or repeated violations.

7.2 Other responses than penalty

7.2.1 Injunction

If the Danish Gambling Authority find that a licence holder fails to comply with the rules on responsible gambling, the Danish Gambling Authority can impress the rules upon the licence holder, including making critical statements or the like.

7.2.2 Revocation of a licence

Ultimately, a licence holder's failure to comply with the rules on responsible provision of gambling may lead to a revocation of the licence to offer gambling.

It follows from the Danish Act on Gambling section 44(1) that:

Section 44. The Danish Gambling Authority can revoke a licence to provide gambling offers if the licence holder or its representative
1) has grossly or repeatedly violated this Act, provisions made under this Act or the terms of the licence.

In practice, the Danish Gambling Authority, with an injunction and a police report, will attempt to make the licence holder act in accordance with the rules. In case of gross or repeated violation, the licence may be revoked.

Apart from the objectively ascertainable requirements in the gambling legislation, for example the requirements for information to the player in the executive orders, where it can be objectively ascertained whether the licence holder has complied with the rules or not, it will always depend on a specific assessment, whether the licence holder has met its obligations to offer gambling responsibly. The response to the violation will also always rely on a specific assessment.

8 Contact the Danish Gambling Authority

More information is available at www.spillemyndigheden.dk.

If you have any questions, you are welcome to contact the Danish Gambling Authority via our contact form at www.spillemyndigheden.dk/en/contact, where you can choose a subject and send encrypted digital mail.

You are also welcome to contact the Danish Gambling Authority at telephone number +45 72 38 79 13.

