

# Embracing player protection

There may be no getting away from responsible gaming in the modern landscape, but *Habanero*, *Better Change* and *Mindway AI* are among those in fact embracing player protection strategies

**R**ECENT wide-reaching regulatory proposals in markets such as the UK and the Netherlands have shone a fresh spotlight on the importance of responsible gaming practices in the modern industry.

The UK government has confirmed the introduction of online slot stake limits – £5 for players aged 25 and over and £2 for those aged 18-24 – having also consulted on the design of online casino content.

In the Netherlands, meanwhile, discussions are underway about deposit limits and enforcing operators’ duty of care obligations.

To discuss these themes and the high-tech tools putting talk of responsible gaming firmly into action, *iINTERGAMINGi* sought out insight from across the igaming industry, with content developer Habanero, responsible gaming organisation Better Change and software provider Mindway AI all enhancing the discussion.

**VICTORIA REED, FOUNDER AT BETTER CHANGE:**

*“We believe that responsible gambling should run through and provide benefit to all areas of a business. We are all about creating and maintaining sustainable and predictable lifetime value for our clients.”*



**SLOTS’ REGULATORY SPOTLIGHT**

“Anticipating these shifts requires insight instead of conjecture,” begins Habanero’s head of business development Arcangelo Lonoce on the changing igaming landscape for slot design and stake limits.

“Rather than altering our game development in response to speculative regulations, we prioritise seamless adaptation.”

Lonoce admits that while igaming suppliers “may not have the power” to influence legislation, a “responsible approach to our business” can ensure the company is “ready for any sudden regulatory shifts” that may arise.

“Such decisions are made by regulatory bodies and are not arbitrary; they are the result of thorough research and analysis of market players.

“When regulators set stake limits, it is done purposefully after studying gambling behaviours.”

Habanero is “in favour of regulation,” Lonoce states, adding that changes must not “inadvertently stifle the industry,” which is a “significant contributor of taxes and employment.”

“An informed regulator should take steps to educate the public, ensuring that limitations are not seen as deterrents that might drive players towards the unregulated black market. Habanero advocates for aligning with the regulator’s approach, being proactive and taking immediate action in accommodating new regulation.”

**BLACK MARKET CONCERNS**

Better Change’s engagement director Rob Mabbett agrees that gambling regulation must be balanced between keeping the regulated market “competitive” against illegal offerings while also ensuring it is not “compromised by over-regulation.”

The UK’s Department for Media, Culture and Sport said the limits, set to come into force in September, will “achieve the government’s stated objectives of reducing the risk of gambling-related harm, with a lower risk of unintended consequences and less disruption to the majority of gamblers who do not suffer harm.”

Mabbett tells *iINTERGAMINGi*: “In terms of safer gambling, the introduction of online slot stake limits is an example of lazy legislation intended to appease those who are anti-gambling.”

“There is no supporting evidence to say that the small percentage of players who play at higher stakes directly correlates with the numbers of those who are affected by gambling harm.”

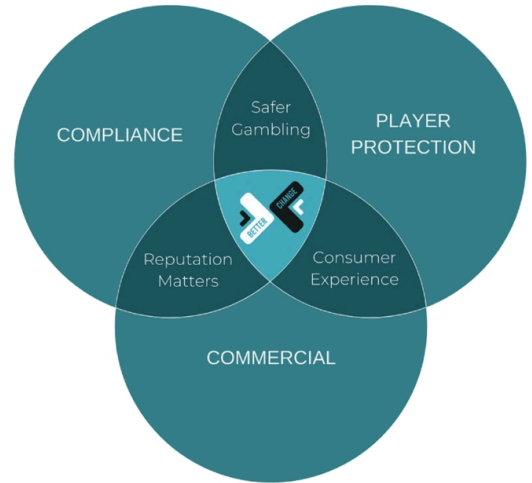
He insists stake and prize limits both online and offline are “important” but calls for the limits to be “reviewed regularly to ensure they are appealing for those who play safely.”

**MONITORING GAME INTENSITY**

Moving onto the tools that are driving responsible gaming practices forward, a big portion of Mindway AI’s recent focus has been on its Intensity Score Model.

A feature of the company’s GameScanner solution, it allows monitoring of a player’s daily gambling intensity and risk – including factors such as time spent on a platform, depositing behaviour and number of bets and stakes. Put together, these factors create an intensity score.

“The Intensity Score Model provides more granular insight into a player’s behaviour and



Better Change’s Positive Play model

also detailed information on how a player may react to an intervention from the operator,” explains Rasmus Kjaergaard, Mindway AI’s CEO.

The Intensity Score Model was a pivotal feature of Mindway’s ICE 2024 showcase, with Kjaergaard reporting “a lot of engagement and interest” in the tool from various sectors of the industry “in the forms of potential clients and partners.”

Mindway made its presence felt even more at ICE through a case study presentation in collaboration with Entain and EPIC Global Solutions.

Navigating the Maze: Unveiling the Journey from Problem Gambling Detection to Effective Intervention – an Entain case study, saw Kjaergaard discuss how Mindway’s aim is “earlier and more individualised and accurate protection of gambling behaviour,” with the Intensity Score Model a vital part of this toolkit.

“The discussion followed Entain’s journey from building an in-house player protection model to partnering with Mindway AI to reinforce and extend the identification of more at-risk or problem gamblers,” he says.

“This model is also complemented by EPIC Global Solutions to advise on actionable interventions and offer expert consultancy, training and education uniquely based on lived experience of gambling addiction.

“The session provided a holistic view of a combined player protection strategy which evidence demonstrated in all three companies’ industry accolades suggests is indeed working.”

**HELPING PLAYERS GAMBLE WISELY**

Better Change’s GambleWise product, meanwhile, is focused on the land-based sector and is a free app that allows players to set gambling parameters “much like they would online,” says Dave Richardson, the company’s head of strategic partnerships.

Players can set a time limit on gambling sessions, control access by selecting days to opt out of gambling and track their gambling by keeping a spending log.

GambleWise can also be linked to individual venues via operator sign-up, with premises requiring the installation of beacons. Should a player enter a GambleWise-supported venue, messages are sent against their parameters and an automated phone call takes place if players exceed any limits.

"This is further supported by the venue as they will have visibility of the customer through a manager app which promotes early interactions and the promotion of positive play, as opposed to interventions which happen once an indicator of harmful play has been observed," Richardson says.

"We are about to launch a large-scale pilot with two tier one operators across thousands of venues, with a view to making upgrades to the app and to further improve the customer experience.

"We also have an exciting roadmap which will see the integration of CRM communications as well as heatmapping capabilities to show larger venues how their customers spend their time within their establishment."

## OPERATOR COLLABORATION

Moving back into the igaming space, working collaboratively with operators is also a central part of Habanero's responsible gaming strategy.

"As there is a great deal of sensitivity from operators around user protection, we do not have access to data about our players and their gaming," Lonoce states.

"However, what we can do from a supplier side is a rigorous KYC assessment for all operators we forge agreements with. The aim of this is to ensure that they are compliant with regulations and have measures in place to limit harmful player behaviours."

As outlined, regulations already differ in various global jurisdictions – and are set to change again with plans coming down the track.

But being a younger company in the igaming space has actually benefitted Habanero, Lonoce says, because the "highly regulated" and "complex" environments it operates in are "ingrained in our game development."

"Scalability and modularity are the core principles of Habanero which have cemented our position as a reliable supplier that can be depended on in a constantly evolving landscape.

"This mindset has been hugely beneficial as

since our inception, agility has been a part of our day-to-day activities."

Responsible gaming has in fact played a leading role in Habanero's game development, features and marketing tools, Lonoce adds.

"For example, when reality checks came about, we ensured these were embedded into our games as a tool for operators in relevant jurisdictions."

## TACKLING THE BLACK MARKET

Although, operator collaboration is not just essential in putting responsible gaming into practice; it also underpins efforts to stave off the illegal market.

Asked about efforts to instil safer gambling across Europe amid the threat of the black market in countries such as Germany, Italy and France, Victoria Reed, the founder of Better Change, declares that the threat of the black market makes it "very hard for a country to approach this issue in isolation."

Reed adds: "There needs to be a collaborative and worldwide effort to counter illegal gambling, but also each territory must remain cognizant of the fact that the regulated market needs to compete with illegal sites and therefore regulation needs to be appropriate."

Working with organisations in countries such as Spain, Italy and further afield in Brazil and Africa, Reed says Better Change has observed considerable variations in the motivations behind gambling.

She says the company's work – and regulation – in these territories "needs to reflect" the reality that some players gamble for entertainment and for others, it is a "way out of financial hardship."

"This does not always mean relaxing regulation," Reed stresses.

## OFFERING FLEXIBILITY

As well as catering to cultural differences in a range of markets, Mindway AI's responsible gaming software caters to the varied types of content available to players in the modern landscape.

"In sports betting, our advanced AI algorithms analyse vast datasets in real time, providing accurate predictions and enhancing the overall user experience," Kjaergaard explains.

"For casinos, Mindway AI's technology ensures responsible gambling practices by detecting early signs of problematic behaviour, providing a full customer view to promote safer gameplay.

"Whether it's online poker, slot machines or virtual sports, our solutions are tailored to address the unique challenges each vertical presents and across different markets with their specific cultural variabilities."

Flexibility is also in the fabric of artificial intelligence, which Kjaergaard says is playing a "pivotal role" in addressing problem gambling.

"The integration of AI technologies such as machine learning algorithms and predictive analytics enables the development of sophisticated tools to detect and mitigate problematic gambling behaviour.

"The increasing emphasis on responsible gambling practices has prompted leading industry operators to invest in AI-driven solutions, not only to safeguard users but also to enhance the overall integrity and sustainability of the gaming ecosystem."

Nevertheless, Kjaergaard notes that Mindway AI does not want to "fully rely on just AI," adding that the company's human expert assessment "is – and always will be – an integral part of what we do."

For Habanero's Lonoce, "the progress is evident" in the integration of AI and "extensive data analysis" to monitor player behaviour and mitigate risks effectively.

"Platforms have also been making progress in centralising marketing and bonus tools in a mature way, encompassing all different verticals to ensure player safety," the company's head of business development states.

Amid the opportunities AI presents to transform the responsible gaming landscape, though, Lonoce outlines one of the key obstacles presented to those in this part of the industry.

"In terms of challenges, when developing tailored strategies for responsible gambling and leveraging AI and business intelligence, it is vital that these programs prioritise player welfare over profit maximisation."

## UK WHITE PAPER FOCUS

The UK's impending online slot stake limits are just one of several policy areas in the white paper that have caused debate.

Proposed financial risk checks have arguably stirred the most discussion, headlined by a formal parliamentary debate at the end of February and a scheduled four-to-six-month pilot by the Gambling Commission.

The official response to the consultation is due shortly after this issue goes to press, but gambling minister Stuart Andrew said at the Betting and Gaming Council's recent AGM that the checks will provide "clear and proportionate rules" and will not be "burdening customers" with information requests.

Better Change's Mabbett tells *INTERGAMINGi*: "The situation with financial risk checks is an unfortunate one as it has resulted in a distrust between consumer and operator, with the former believing they will need to present various amounts of identification and evidence of funds to have a bet."

"Most operators, if not all, will already be doing some form of affordability check," he adds, calling on the standardised checks not to bring "an unnecessary group of people into the at-risk category due to blanket policies."

He also stresses that the policy must not end up "discriminating against gambling as a legitimate leisure spend when so many others such as alcohol, tobacco and shopping are left unchecked."

The proposed statutory levy on UK operators for research, education and treatment of gambling harms is supported in the industry.

However, the difference of opinion comes when setting out who should administer the funds.

Again, the official response to the statutory levy consultation is due shortly. The stated plan thus far is for the NHS to commission all RET funding from the statutory levy.

Charities and third-sector organisations have warned of the subsequent impact on people who rely on problem gambling support services in the community, but Andrew said the government is aware of those concerns, stating in December that the levy must not disrupt the current

### ARCANGELO LONOCE, HEAD OF BUSINESS DEVELOPMENT AT HABANERO:

*"While suppliers may not have the power to influence legislation, by adopting a responsible approach to our business, we can ensure we are ready for any sudden regulatory shifts that may arise."*



problem gambling support framework.

Mabbett admits that the success of the levy “depends on who will be in control” of the funds.

He says the battle lines being drawn over the potential shake-up of the commissioning of the funds is a “serious concern for many organisations who have done some incredible work over the past 50 years but are now worried about their future.”

“We cannot put our own political agendas above the people who will benefit from the services funded by the levy,” Mabbett concludes here.

“Nobody should be excluded from the collective effort to reduce gambling harm, including the industry.”

## RESPONSIBLE GAMING PARTNERSHIPS

Rounding off the discussion, the experts from Habanero, Better Change and Mindway AI all agree that industry partnerships form the backbone of pushing the responsible gaming agenda further and wider.

“Keeping responsible gaming at the forefront of what we do is vital for the longevity and sustainability of not only our business, but the wider gambling industry as a whole,” Lonoce says.

“At Habanero, the most important aspect of our responsible gaming strategy is to comply with all relevant legislation for casino games. Our philosophy of ‘a great game should work everywhere’ is completely ingrained into our production process, which extends beyond merely providing a slot with universal appeal; it also entails ensuring seamless adaptation to meet the diverse requirements of all markets where we operate.

“Within the game itself, we use proprietary

### RASMUS KJAERGAARD, CEO AT MINDWAY AI:

*“Whether it’s online poker, slot machines or virtual sports, our solutions are tailored to address the unique challenges each vertical presents and across different markets with their specific cultural variabilities.”*



mathematics which maximise the entertainment value and keep this top of mind when playing one of our slots. In addition, we use clear communication from the outset to ensure that our games are easily recognised as a form of adult entertainment.”

For Mindway AI, responsible gaming collaboration in the past year has included its involvement in The European Committee for Standardisation initiative to establish the European Standard of Markers of Harm for Online Gambling.

Elsewhere, the company’s Gamalyze tool was the first responsible gaming tool deployed at a federal level across the US on responsibleplay.org via the National Council for Problem Gambling, and partnerships with the likes of AnonymMind and Tabcorp have further bolstered the company’s reach.

“We actively seek out and foster partnerships that align with our vision, leveraging collaborative strengths to create synergies that drive mutual success,” Kjaergaard says.

“Recognising the dynamic nature of

today’s gambling landscape, we have invested significantly in R&D to innovate and enhance our existing products and services, ensuring that we stay at the forefront of technological advancements.

“Simultaneously, we remain vigilant to market changes, adapting our strategies to capitalise on emerging opportunities and trends. Our commitment to exploring new markets involves a thorough analysis of shifts in gambling legislation and consumer behaviours, enabling us to identify regions with potential for growth.”

Better Change’s training package with RG24seven “will provide the UK with a version of their successful US training,” Richardson outlines, focusing on safer gambling from an industry perspective and looking to “empower those working in gambling to provide a safe and fun environment for their customers.”

“We work with consumer advice organisation WhichBingo to help bring the positive play message to players as well as recognise the good work operators are doing.

“In fact, we will be presenting the inaugural Positive Play award at the WhichBingo awards in April, and we have been very impressed with the quality of the submissions for that.

“We work with the Racing League and Southampton FC on Fan Engagement, with more football clubs to be announced shortly. Further to this, we work with and are committed to continuing to work with industry operators, game designers, trade bodies and regulators on promoting positive play.”

For anyone involved in the modern gaming industry, there is no getting away from responsible gaming. But with the array of tools and breadth of partnerships being forged in the sector, stakeholders are in fact embracing player protection and safer gambling.

Mindway AI’s Intensity Score Model

