



ISLE OF MAN

Online Responsible Gambling Survey Report

October 2024

Gambling Supervision Commission

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Glossary Of Terms

Term	Meaning in this Report
RG	Responsible Gambling
SE	Self-Exclusion
Deposit Limit	A limit restricting the amount a player can deposit with an operator during a period specified by the player
Loss Limit	A limit restricting the net amount which a player can lose within a period specified by the player
Spending Limit	A limit restricting the amount a player can spend on online gambling within a period specified by the player
Operator	The holder of an online gambling licence, issued under the Online Gambling Regulation Act 2001

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Executive Summary

This report contains summary findings from the Responsible Gambling (RG) Survey, exploring the effectiveness of the RG controls utilised by operators.

The survey was sent out to the 35 holders of a Full or Network Services OGRA licence that, on 1 December 2023, were actively trading on a Business-to-Customer basis. The data collected was for the period 1 January 2023 to 31 December 2023.

Engagement with the survey was high, with the GSC receiving 33 replies.

The survey examined operator attitudes towards both underage gambling and responsible gambling more generally, including both quantitative data relating to operator interventions together with qualitative data relating to the operators' professional judgments as to the effectiveness of these interventions.

Headlines Statistics

All respondents offer registration controls to prevent the registration of underage gamblers.

Licence holders refused or cancelled the registration of 2,972 underage gamblers in 2023.

All respondents indicated that they believed the existing tools to be 'effective' or 'very effective' in preventing underage people from gambling with their services.

All respondents offer at least one control from deposit, spending, or loss limit controls.

c.2.5% of registered customers use transaction-limiting controls.

c.0.8% of registered customers use a self-exclusion (SE) facility.

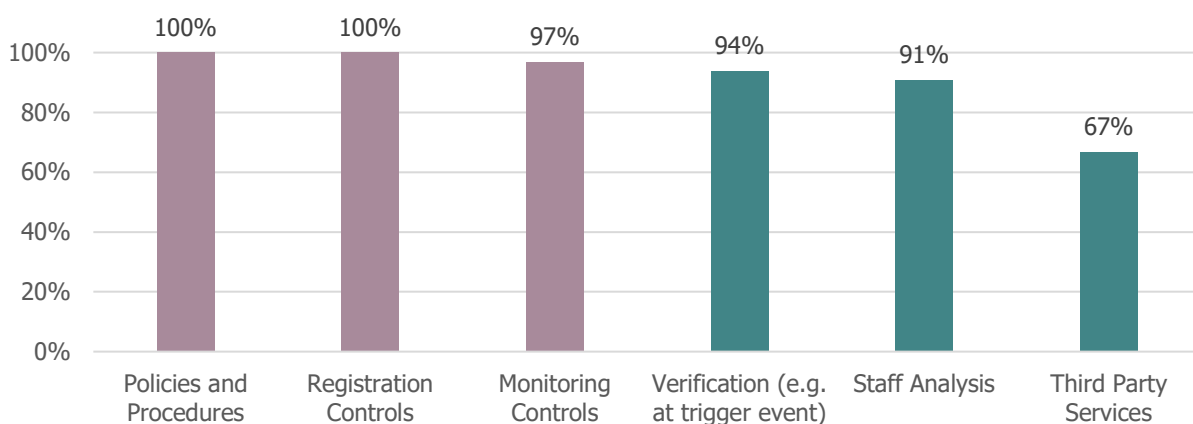
The total reported usage of SE in 2023 was 21,999 representing c.0.8% of the estate.

Respondents captured 5,134 circumvention attempts, which represents 23% of all SE cases where access was prevented by the licence holders' detection systems.

Underage Gambling

All respondents answered that they utilised registration controls along with having relevant policies and procedures in place to prevent underage people from registering as customers. The most common form of registration control was to prevent a prospective registrant from entering a date of birth that was 'invalid' due to indicating they were less than 18 years of age. 32 respondents answered to explain that they utilised monitoring controls to detect underage players.

Controls and Application of Mechanisms Used to Identify Underage Customers

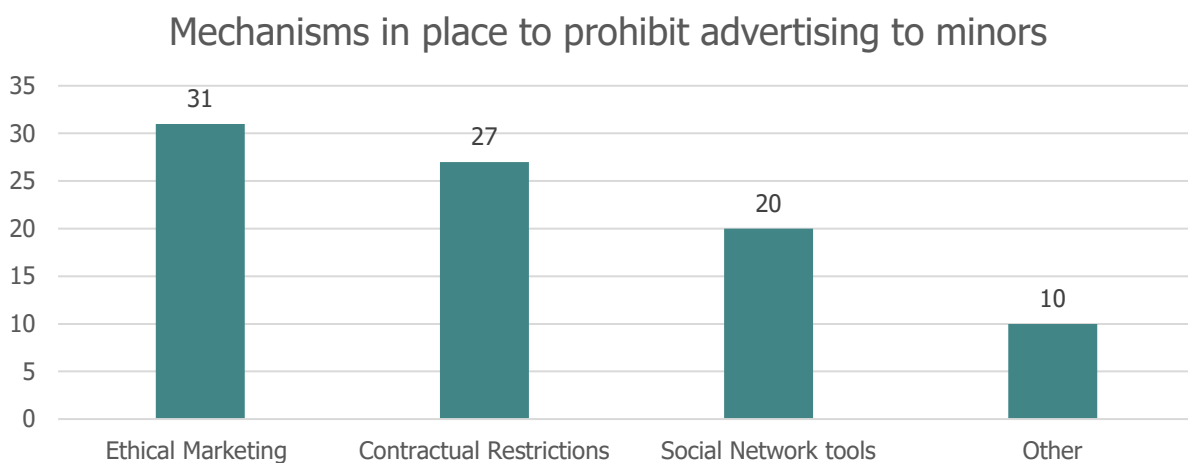


All respondents indicated that they believed the existing tools to be 'effective' or 'very effective' in preventing underage people from gambling with their services.

Underage Gambling Cont.

In relation to refused or cancelled registrations, 79% of respondents indicated that they had no instances of underage people registering or gambling with their service.

31 respondents confirmed they had an ethical marketing policy that sought to ensure advertising was not targeted at underage people, 27 had contractual restrictions in place with their affiliates and other third-party marketing providers, and 20 respondents reported they had social media policies in place to ensure adverts were not targeted at underage customers.



The Requirements

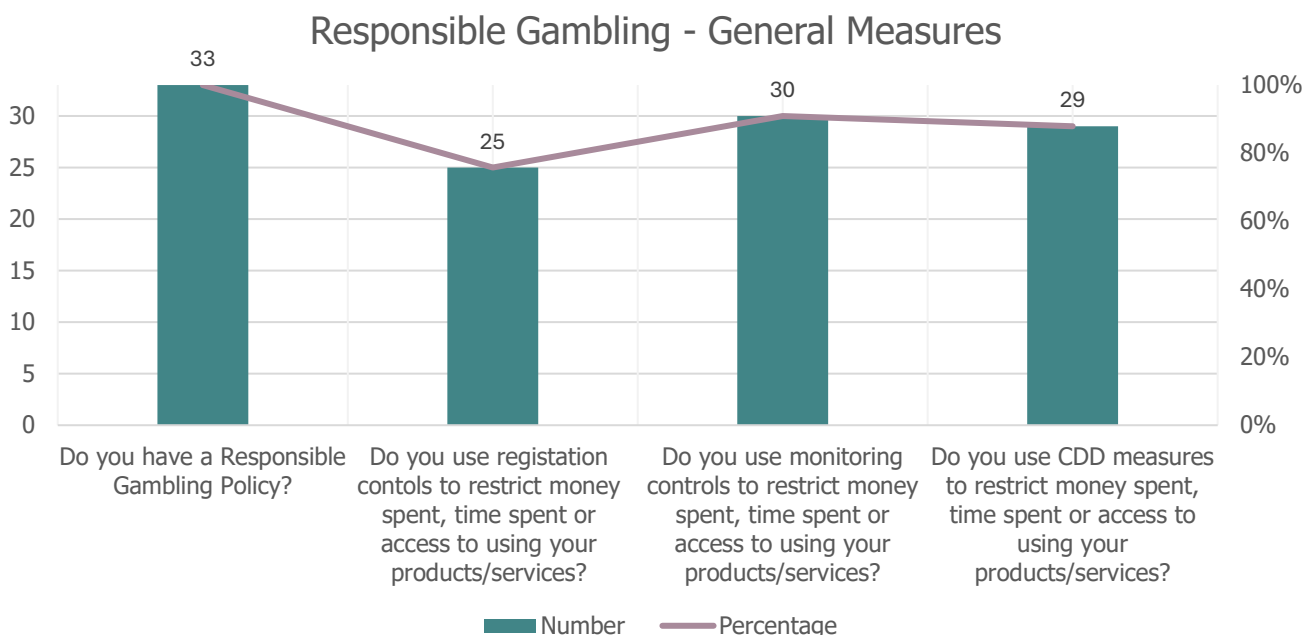
Operators need to ensure that:

- A mechanism exists to exclude those under 18 years old who try to register
- Advertising is not targeting under 18 year olds
- Websites include a statement barring those under 18 years of age

Responsible Gambling

General Measures

All respondents indicated that they offered some form of elective control relating to deposit limits, spending limits, or loss limits in line with the legal requirement under Online Gambling (Registration and Accounts) Regulations 2008 (as amended).



The Requirements

Licence holders must implement measures to protect players, including:

- self-exclusion options;
- setting deposit limits; and
- providing access to responsible gambling agencies

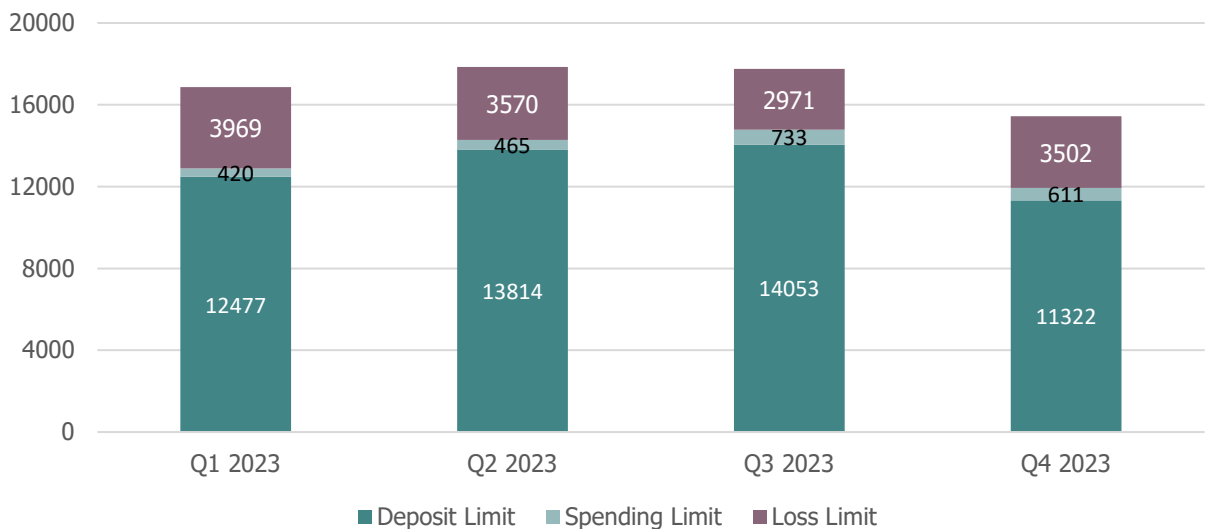
Elective Controls

All respondents offered some form of elective control as required by regulations. 31 respondents offered an elective deposit limit, 22 respondents offered an elective spending limit, and 16 respondents offered an elective loss limit (NB respondents may offer more than one elective control). Take up of the respective controls is highlighted below.

The total reported usage of elective controls in 2023 was 67,907 customers, representing c2.5% of the estate.

*33% of respondents indicated that, whilst the above elective tools were available, they were unable to provide statistics in relation to their usage. Therefore, the table is likely to under-represent the usage of these elective tools.

Elective controls - 2023



Elective Controls Cont.

In general, respondents did not indicate the limits at which customers chose to set their elective controls. Respondents did indicate the minimum level that a customer could set an elective control, which was typically 1 GBP/EUR/USD; however, respondents did not generally indicate the maximum figure offered.

Where respondents did indicate a maximum figure, this ranged from EUR 230 per week and up to USD 10,000 per 30 days. Respondents, in general, indicated that customers could choose their elective controls by means of a 'free text' box; respondents were not specifically asked, and did not indicate, whether suggested control limits are provided by the operator.

The Requirements

Licence holders must make one of the following available to players:

- the ability to set deposit limits;
- the ability to set spending limits; or
- the ability to set loss limits.

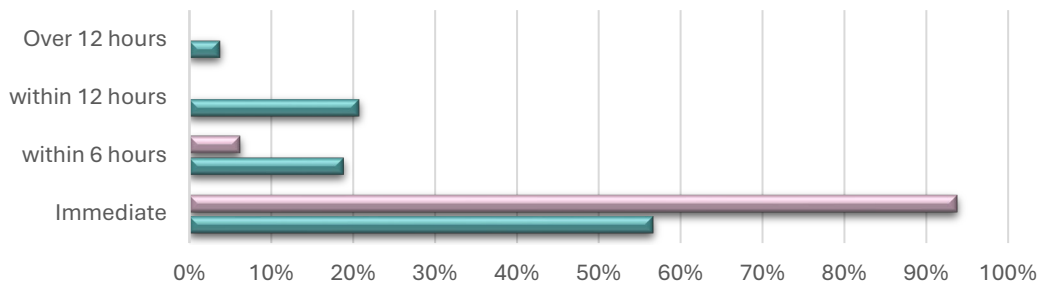
The operator must comply with any request to apply a limit as soon as reasonably practicable.

Self-Exclusion

All respondents offer a self-exclusion facility to customers, and most respondents confirmed that an operator could impose an exclusion where staff believed it necessary.

Some respondents sought to emphasize a distinction between short-term SE, often referred to as 'time out', and medium/long-term SE. A number of respondents grouped SE durations of one month or less as a 'time out', with longer durations being 'self-exclusion'. Most respondents offered durations of six months, one year, five years, and permanent exclusion, with other responses varying within these parameters.

Time taken to action a self-exclusion request



	Immediate	within 6 hours	within 12 hours	Over 12 hours
Minimum Option	94%	6%	0%	0%
All Options (Subject to rounding)	57%	19%	21%	4%

Minimum Option All Options (Subject to rounding)

The Requirements

The operator must use its best endeavours to exclude from and to cancel the registration of, any person —

- who identifies himself or herself as a problem gambler;
- who is so identified, with his or her consent, by a registered medical practitioner; or
- whom the operator believes to be a problem gambler.

Self-Exclusion cont.

The time taken to action a SE request varied by the means by which a customer made a request. Requests received by email could take 6 hours to take effect compared to customer managed account options that would usually take effect immediately.

All respondents could apply at least one form of SE request within 6 hours.

A number of respondents advised that they intended to add clarity to their terms and conditions or responsible gambling policies to ensure that customers were unequivocally aware of the timing of the options available to them.

Complaints

73% of respondents reported to receiving complaints relating to responsible gambling matters in the period.

Complaints mostly related to:

- Correspondence received which ultimately led to a limit or SE request;
- Provision of documentation for affordability checks; and/or
- Access not being granted during a SE period.

Two complaints related to successful circumvention of SE controls.

Transactions

100% of respondents advised that customers had access to a statement of transactions from their accounts, which was used 1,193,367 times in 2023.

Outcomes

The GSC will use the findings of the RG Survey to make necessary adjustments to the current responsible gambling policies and consider improvements on how requirements and related guidance are communicated to licensees and the public.

The goal is for licensees and the public to have access to clear information and guidance, resulting in improved understanding of regulatory requirements.

The GSC is committed to ensuring that the interventions that are specified in regulations are evidence-led and intends to use the results of the survey to inform future legislative changes.

As requirements evolve with emerging changes, it is crucial that licensees fully understand their responsibilities to ensure compliance at the earliest opportunity.

To achieve this, the GSC will identify opportunities to improve understanding of regulatory requirements by engaging with licensees, consumers, and others to clarify licensees' responsibilities.



2024
Further
Develop
RG Policy

2025
Issue RG
Specific
Guidance

Future
Legislative
Changes



Appendix

Survey Questions

Section 1 - Underage Gaming

Q1a What mechanisms and controls have you adopted to detect and prevent under 18s from gambling with your products/services?

Q1b How are those mechanisms applied?

Q2 In your opinion, how effective are the mechanisms and controls listed under Q1 in preventing under 18s from gambling with your products/services?

Q3 Please confirm how you detect and manage under age players should they obtain access to your site despite your procedures?

Q4 How many registrations were a) refused and b) cancelled between 1 January 2023 to the 31 December 2023 due to under age player considerations?

Q5 What mechanisms do you have in place to prohibit advertising to minors?

Section 2 - Responsible Gaming

Q6a Do you have a Responsible Gambling Policy?

Q6b Do you use registration controls to restrict money spent, time spent or access to using your products/services?

Q6c Do you use monitoring controls to restrict money spent, time spent or access to using your products/services?

Q6d Do you use CDD measures to restrict money spent, time spent or access to using your products/services?

Q7 In your opinion, how effective are these mechanisms and controls listed under Q6?

Q8 Does your home page contain hyperlinks to a site/or sites that assists gamblers experiencing gambling-related harm?

Q9 How many times during the period 1 January 2023 to 31 December 2023 has the hyperlink to a site/or sites that assist problem gamblers been used?

Q10 Do you have elective controls on deposit limits?

Q11 How many times have these elective controls on deposit limits been used during the period 1 January 2023 to 31 December 2023?

Q12 Do you have elective controls on spending limits?

Q13 How many times have these elective controls on spending limits been used during the period 1 January 2023 to 31 December 2023?

Q14 Do you have elective controls on loss limits?

Q15 How many times have these elective controls on loss limits been used during the period 1 January 2023 to 31 December 2023 ?

Q16 Which, if any, exclusion periods are offered to your customers? Please provide details of how these periods are accessed, e.g. elective self-exclusion, operator-imposed exclusion, etc.

Q17 How many customers during the period 1 January 2023 to 31 December 2023 have used your self-exclusion periods?

Q18 How many customers during the period 1 January 2023 to 31 December 2023 attempted to circumvent their self-exclusions?

Q19 On receipt of a player request to self-exclude how quickly is this actioned?

Q20 Do you provide training to staff in relation to responsible gambling and the availability of tools?

Q21 What would you consider as "red flags" for players with gambling-related harm? Can customer services/support staff identify these "red flags" during interactions with customers? If so, which (if any) further steps may you take?

Q22 What proactive measures do you adopt to detect and prevent players with gambling difficulties ("problem gamblers") from using your products/services?

Q23 Do your customers have access to statements of their transactions? Please explain how they are made available?

Q24 How often have your customers accessed their statement of transactions during the period 1 January 2023 to 31 December 2023?

Q25 Have you had any complaints during the period 1 January 2023 to 31 December 2023 that relate to problem gambling?



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