NEWSletter



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WARNING FROM POLAND

The Ministry of Finance, specifically its Department of Procedural Agenda and Gambling Regulation, has alerted Czech licence holders to the gambling rules applicable in Poland. This notice was issued following a request from the Polish gambling regulator, which informed Czech operators of the risks associated with operating and promoting gambling in Poland without the relevant licence.

In its announcement, the Ministry of Finance said that the Polish gambling regulator is blocking websites offering internet gambling that are not allowed in Poland and that are available here. At the same time, websites that promote illegal gambling are also blocked. It added that the operators of such sites may face sanctions.

According to the Polish Gambling Act, gambling advertising is generally prohibited, including a ban on sponsorship in sports.

"The presentation of information containing the name or logo of a bookmaker that is not licensed by the Polish gambling regulator during sporting events (for example, on athletes' jerseys) constitutes a violation of the provisions of the Polish Gambling Act," the Czech Ministry of Finance said.

Poland's gambling regulator has warned that unlicensed operators should take measures to ensure that their promotions and games are not available in Poland or face sanctions.

The full announcement by the Ministry of Finance can be found in czech here.

IFGR MET WITH REPRESENTATIVES OF THE COMPETITION AUTHORITY



After some time, we met with representatives of the Office for the Protection of Competition (OPC) to discuss their current views and criteria for evaluating gambling ordinances for their compliance with competition, which we then incorporated into a forthcoming cookbook for municipalities on how to prepare smart gambling regulation. During the discussion, we received the gratifying information that **there are currently no proceedings pending before the OCC regarding the evaluation of gambling ordinances**. According to their words, the situation has significantly improved in recent years. The OCC attributes this positive development to its methodological support and training for municipalities.

Unfortunately, we continue to disagree with the OAG on the view of the whole of gambling ordinances. While we point to the growing number of full-stop ordinances as one of the causes of the growth of illegal gambling, the OCC does not share this view. In their view, full-blown bans are transparent from a competition perspective and do not need extensive justification. In this respect, the OCC relies on case law which supports this approach. It assesses competition only from the perspective of the territory of the municipality, not the wider territory of, for example, the region. **However, the OCC has promised to participate in the consultations for the preparation of the cookbook in case of ambiguities**, but due to its role as an inspection body, it cannot take over the content of the cookbook.

GOVERNMENT OFFICE HELD A WORKING MEETING ON ILLEGAL GAMBLING



Representatives of the Drug Policy Department at the Office of the Government, with the participation of representatives of the gambling sector and representatives of the Ministry of Finance and Customs Administration, organized a workshop on the situation of illegal gambling on the Czech gambling market. The meeting was conceived by the Office of the Government as a complement to the current efforts of the state to regulate advertising on gambling. According to the representatives of the state, they want to focus mainly on online illegal gambling, social networks, YouTube, GoogleApps.

IFGR stressed that it is only thanks to the coordinated action of legal operators that something has really started to happen in this field, **especially the rapid reduction in the number of visitors to the main illegal websites**, which is certainly due to the accelerated blocking procedure. In the context of illegal landbased gambling, market representatives have recommended **penalising owners of premises where illegal gambling establishments appear,** which **could be** a solution to the repeated appearance of black gambling establishments in the same **location.** One of the reasons why players seek out illegal gambling is also the much more attractive product offerings on such sites. Products that are banned on the Czech legal market by the Ministry.

We are pleased that Director Šabo has recognized that local regulation and prohibition ordinances have a significant impact on black gambling establishments. Customs representatives further confirmed that the main problem in the fight against illegal gambling is their limited staff capacity, a situation that will be exacerbated by their restructuring and reduction in the number of Customs offices, as well as the demand from people. This is because even if a municipality issues a prohibition ordinance, people are used to going to the place and so there is a high probability of an illegal establishment. The government office sees the main motivation for gamblers to gamble illegally is that the demand for gambling is stimulated by the excessive amount of gambling advertising on TV around sports matches and on the internet.

Stakeholders agreed that it is very important to quantify the size of the illegal market so that appropriate measures can be taken to combat it. Both the state and the gambling sector will focus on social networks, platforms, streaming, Google, YouTube. It was also agreed to jointly educate the public about illegal gambling and its pitfalls. No strategy on how to proceed has emerged from the meeting held and therefore there is room for coordination of the area by IFGR.

IFGR IS A MEMBER OF THE INTER-MINISTERIAL COORDINATION GROUP IN THE FIELD OF AML

Based on international standards, the Government of the Czech Republic has established an inter-ministerial coordination group to combat money laundering and terrorist financing. The purpose of this platform is to enable effective communication, coordination and cooperation between all the agencies involved in this area. Whether from the public or private sector. The Financial Analysis Unit (FAU) has decided that **IFGR will be an associate member of this working group**, which we very much appreciate, as this way we will have an information service on this area and the

measures taken. The first working meeting will take place before the end of the year, in mid-December.

RESPONSIBLE GAMBLING WEEK IS NOW IN ITS FOURTH YEAR



At the beginning of November, from 4 to 10 November, the fourth edition of the Responsible Gambling Week took place under the auspices of the Responsible Gambling Project. As in previous years, it aimed to draw the attention of the general public to the risks associated with the development of gambling addiction and to provide advice on how to prevent and address them. This year's theme focused on what pathological gamblers go through during treatment, how to avoid relapse and the role that family can play in the treatment process. The programme included, among other things, open days at treatment centres in selected regions and daily online counselling.

Prevent 99, Portimo, Renadi, Sananim, Agarta, Blue Cross and the platform Naberte kurz of the Podané ruce Society participated in the Responsible Gambling Week, publishing each day a part of their podcast series with authentic stories of pathological gamblers. In cooperation with adictologist Matej Černý and the head of the Gambling Ambulance Marcel Ambroz from Sananim, the project prepared educational online webinars. The project's partners, gambling operators Fortuna, Chance, Sazka and Tipsport, also prepared their activities and awareness campaign in the media and on social networks.

In addition to media coverage of practical assistance, Responsible Gambling Week was marked by expert discussions on current trends in gambling regulation. The Institute organised the first edition of the international conference Prague as the Heart of Responsible Gambling or the third edition of the National Conference on Gambling.



INTERNATIONAL CONFERENCE PRAGUE AS THE HEART OF RESPONSIBLE GAMBLING

The first edition of the international conference Prague as the Heart of Responsible Gambling attracted international experts and scientists working on safer gambling.

Using AI to prevent risky gambling

The conference provided a platform for discussion between experts, representatives of state authorities and gambling companies on how to regulate gambling in a smart way. One of the main topics was the position of artificial intelligence in responsible gambling and the

related ethical challenges. For example, Professor Mark Griffiths, based at Nottingham Trent University, spoke about how data from online accounts can be used to identify and prevent problem gambling in a way that can be used for early intervention.

The growing interest in preventing problem gambling has motivated his research into risky online behaviour by examining data from gambling accounts. Griffiths' research studies therefore seek to uncover patterns that may indicate problem gambling before players formally seek help. Some of the key indicators the researcher is looking at include increased frequency of deposits, trying to make up losses, playing different types of bets, using multiple payment methods or frequently cancelling withdrawals.

Studies also show that individual indicators on their own may not clearly indicate problem gambling, but their combination increases the likelihood of identifying risky behaviour. The research team therefore suggests that gambling operators should monitor different types of interactions. Based on this data, a detailed analysis of gambling profiles could therefore help operators to intervene early for at-risk gamblers.



Personalised intervention

Francesco Rodano, Director of Public Policy at Playtech and former Director of Online Gaming at the Italian Customs and Monopolies Authority, also presented his contribution in this area. According to his findings, the use of artificial intelligence and behavioural analysis to promote responsible gaming and protect players from the negative consequences of gambling is important today. Indeed, traditional methods such as self-limiting limits and exclusion often depend on the initiative of the player, which is a problem for those at risk. Artificial intelligence enables early identification of at-risk gamblers and personalised intervention that responds to specific behavioural patterns and prevents serious problems. For example, the BetBuddy system, used by Playtech, tracks dozens of factors such as frequency of play and night-time activity, and through behavioural and data analytics can better detect risky behaviour.

AI technologies such as chatbots, sentiment analysis and learning models can make support more efficient and accessible for players, while collaboration between providers, researchers and regulators is key to the ethical and effective use of AI. Projects like Safe Bet show how AI and behavioural science can work together to create



safer gaming environments. Combining the technological capabilities of AI with human empathy opens up new possibilities to ensure the long-term protection of players and the sustainability of the industry as a whole.

Linking psychology with the use of data to make gaming safer is further explored by Dan Thwaites, who spoke at the conference about Capuchin Behavioural Science's approach. Traditional methods of responsible gaming, he says, often use generic messages that do not adequately account for different player motivations and behaviours. In contrast, Capuchin proposes profiling players according to psychological characteristics and risk factors, allowing communication and intervention to be targeted directly at the specific needs of each type of player, from casual bettors to competitive 'challengers' who face a higher risk of problem gambling.

In addition to psychology, data analysis plays a crucial role in improving the prediction of risky behaviour. By collecting information on gaming patterns, app usage and other digital traces, predictive models can be created that allow operators to identify potentially proble-

matic players early on. This approach is dynamic and requires ongoing testing and optimisation to match changing player behaviour and provide effective support for more responsible gaming.

Foreign experience

Other debates and expert contributions focused on the current role of operators and states in the detection and intervention of risk players or how approaches differ between European countries. Tanja Sveen, Senior Advisor and Team Leader at Norsk Tipping AS, shared valuable insights from Norway.

The Norwegian regulatory model focuses on preventing the negative consequences of gambling through a comprehensive solution for digital interactions, in real time. In a pilot project, they intervened identified at-risk gamblers first through phone calls and, based on positive feedback, developed the Spillepuls tool, which covers a wide range of events and markers of risky behaviour. A specific algorithm is developed for each of these, which implements a personalised interaction when risk markers are identified. The purpose of the tool is to stimulate self-reflection and make specific recommendations to reduce risky behaviour.

THIRD NATIONAL GAMBLING CONFERENCE

The **National Gambling Conference**, which traditionally takes place during Responsible Gambling Week, focuses on the discussion of the current state and future direction of the domestic gambling market. This is a unique debate in the Czech Republic between experts, academics, legal specialists in the field of gambling and representatives of state authorities.



This year's third edition of the conference focused on this year's regulatory news. Since 2017, the domestic gambling market has undergone dramatic developments and rules are being introduced to help protect players more. Whether it be registration, all players, the ability to set your own limits of play or making it impossible to play through the so-called Excluded Persons Register. Since this year, the regulation of gambling in the Czech Republic has undergone further major changes, the most resonant of which has been the possibility to exclude oneself from playing via the **Panic button**. The implementation of these changes, bringing both positives and negatives, was discussed by **Tomáš Bureš** from the **Ministry of Finance**, **Zdeněk Brázdil** from **Tipsport**, **Miloš Hána** from the **Electrotechnical Testing Institute** and **Martin Lajza** from the **European Data Project**.

The current topic of **regulation of gambling advertising** was discussed by **Jan Strakoš from the Ministry of Industry and Trade and Jan Řehola from the Institute for Gambling Regulation.** They discussed the possibilities of regulation, but also self-regulation of the market.



The debates of experts from the **Financial Analytical Office (Magdaléna Plevová and Viktor Kabeš)** and expert **Kamil Kouba** focused on the issue of money laundering. There was also a presentation of the development of the gambling market in **Slovakia**, which was taken **up by Martin Bohoš from the Office for Gambling Regulation** and **Dávid Lenčéš from the Institute for Gambling Regulation**. Together with Jan Řehola, they discussed international cooperation between the Czech Republic and Slovakia.

The world of video and mobile gaming and gambling is constantly converging. In recent years we have seen, in games aimed at children, phenomena that include gambling elements such as **lootboxes or skins**. Children develop an addiction which they then carry into their adult lives. The panel discussion 'Let's not forget lootboxes' focused on this very topic. **Jaroslava Suchá from Palacký University in Olomouc** presented a recent survey that revealed the most vulnerable age groups of children and adolescents. **Jiří Koreš from Prevent 99** outlined how to work with children and families who have to fight this phenomenon from his experience. **Martin Bohoš**, Director General of the Office for the Regulation of Gambling Games, contributed his personal experience with the negatives associated with lootboxes and skins and outlined how Slovakia is fighting lootboxes.

RECORD NUMBER OF ILLEGAL GAMBLING SITES BLOCKED. THE CURRENT FIGURES HAVE ALREADY SURPASSED LAST YEAR'S

The Ministry of Finance has blocked a record number of illegal websites. By mid-November this year, the Treasury had blocked 462 websites - 31.5% more than in the whole of 2023, when 351 sites were blocked. The record numbers of blocked sites are the result of an amendment to the Gambling Act that came into force at the beginning of the year.

Accelerated blocking process and broader focus

Thanks to the new legislation, it is now possible to block not only illegal gambling sites themselves, but also advertising or promotional sites. These sites are often the entry point to illegal online gambling and blocking them is proving to be an effective way to limit players' access to these offers.

"Previously, it was necessary to prove that the site was targeting Czech players, which delayed the process. Now it is enough that the site does not have a permit to operate and is accessible from the Czech Republic," explains Martin Šabo, Director of the Department of Procedural Agenda and Gambling Regulation. Thanks to this change, the time of the blocking process has been reduced from an average of 4 to 6 months to a third.

Advertising websites as a key problem

Advertising websites are displayed in high positions in the most frequently used search engines Google and Seznam, thus ensuring high visibility for illegal operators. However, this is gradually changing with the new option to block advertising sites as well. A case study by the Institute for Gambling Regulation and GTO Solutions, s.r.o. focusing on one of the largest advertising websites in the country (Hravelka.com) promoting over 30 illegal gambling sites, which was blocked in March this year, and from a monthly traffic of tens of thousands of visitors, the number of readers gradually started to drop to zero over the following weeks. The annual number of visitors reached up to 190,000.

A mirror site with the same content was created in April to accompany the blocked site, but despite an initial momentary increase in popularity, it does not reach its original traffic levels in the long term. From the summer until now, the new site has had less than a thousand readers per month. As a result, traffic to the mirror site has dropped by up to 94% compared to the original site, which has also resulted in fewer players of the illegal online gambling sites themselves. The Ministry of Finance and Customs are, of course, also dealing with these mirror sites on an ongoing basis.

In addition to internet service providers, companies offering apps in their digital shops are now also obliged to block sites with illegal offers. For example, Google Play or the App Store must ban apps with illegal content.

Pandemic gambling boom and its risks

The growth of online gambling has been significantly boosted by the covid-19 pandemic, when restrictions on brick-and-mortar establishments led gamblers to move online. Since 2021, online gambling revenues have regu-

larly exceeded those of bricks-and-mortar gambling establishments. However, with this comes the growing problem of illegal gambling, which according to the Institute of Gambling Regulation accounts for up to 30% of all online betting.

"More than 50% of organic search results on Google contain links to illegal gambling. The situation is alarming and requires a systematic approach," warns Jan Řehola, Director of the Institute for Gambling Regulation.

Progress but also challenges

While the new legislation has yielded positive results, illegal gambling remains a problem that requires constant attention. The opportunities for illegal gambling have evolved hand in hand with the development of new technologies. Therefore, it is essential to monitor modern trends where illegal gambling is moving.

GERMAN REGULATOR PRAISES CHANGES IN ADVERTISING POLICY



Germany's gambling regulator, the Gemeinsamen Glücksspielbehörde der Länder (GGL), has announced significant improvements in the fight against black market gambling in the country. Recent changes to Google's advertising policy have alleviated problems associated with the promotion of illegal gambling.

Fundamental changes in advertising policy

At the end of September, Google updated its rules for gambling and gaming ads in Germany. Previously, unlicensed companies could target ads in the German market, which often led to the promotion of illegal gambling providers. However, new rules have prevented such practices: applications for certification from unlicensed companies are rejected and existing certifications have been revoked.

The changes were introduced at the request of GGL itself, which is already reporting positive results. Since the implementation of the new policy, no paid or sponsored ads from illegal operators appear on Google search results pages. The changes also apply to comparison portals, where the regulator has also not detected links to illegal gambling providers.

"In our view, the revised advertising guidelines currently have a clear effect," said GGL director Ronald Benter.

Continuing the fight against the black market

Despite these successes, GGL stresses that further work is needed to reduce the influence of illegal providers, particularly in the area of search engine optimisation (SEO). Indeed, illegal operators continue to use tactics such as intensive link marketing and manipulation of search engine rankings to remain visible in free search results.

According to an interim report by GGL, illegal gambling accounted for only 4% of the German market in 2023. However, this figure is significantly lower than estimates from independent sources. For example, a study by the University of Leipzig in November 2023 reported that illegal gambling accounted for up to 48.8% of all activity in Germany.

GGL therefore continues to strengthen its cooperation with Google and is looking for ways to crack down on SEO strategies used by illegal operators. *"We will continue to monitor developments and stay in contact with Google to further reduce advertising opportunities for illegal gambling operators,"* Benter added.

EUROPEAN SAFER GAMBLING WEEK 2024

At the end of November, the eighth annual "Safer Gambling Week" took place, engaging participants across Europe. Organised by key UK organisations including the Betting & Gaming Council (BGC), the British Amusement Catering Trade Association (Bacta) and the Bingo Association, the event continues its mission to promote responsible gambling practices and raise awareness of the support available.



Awareness and Action Week

Throughout the week, players in both online and brick-and-mortar establishments were shown messages about safer gaming. The goal, according to organizers, is to spark a national discussion about responsible gaming.

"Ensuring safety should always be at the heart of every aspect of gambling," said Andrew Rhodes, Director of the Gambling Commission. Safer Gambling Week, he said, offers an opportunity to highlight this priority and facilitate the exchange of best practice within the industry.

Building on past successes

Last year's campaign saw a significant increase in the use of safer gaming tools. More than half of participants set deposit limits for the first time and the number of users activating reality checks increased by more than 300%. Social media also saw record engagement, with more than 50 million impressions across platforms.

Grainne Hurst, Director of the BGC, highlighted the campaign's role in showcasing the industry's year-round commitment to safety: *"Previous years have shown that this campaign leads to increased use of these popular safer gambling tools."*

Support from government and industry leaders

The project is also supported by Baroness Twycross, the UK's Minister for Gambling. This is the first time the project has been run under a Labour government since the party's election victory in July.

"Safer Gambling Week is a good opportunity to recognise the important work that is being done to protect those at risk of gambling," said Baroness Twycross. *"We welcome the industry using this week to highlight the tools and support available to prevent people suffering potentially life-changing harm."*

George McGregor, Executive Director of Government Relations at Bacta, also spoke about the impact of the project. He said, *"Safer Gambling Week provides an opportunity to highlight what the gambling industry does throughout the year to ensure that customers can have fun, safe in the knowledge that operators are there for them and their colleagues if things start to get out of hand."*

Andrew Lee, chief operating officer of QiH Group, a London-based gaming affiliate, said it was important that a cross-industry approach to responsible gambling was adopted. He said, *"As affiliates are often the first point of contact for customers, our priority is to maintain a safe and compliant environment that benefits our affiliates and ultimately their customers."*

European cooperation

The European dimension of Safer Gambling Week included webinars, discussions and social media campaigns that addressed key topics such as problem gambling, responsible gambling and the use of AI to promote safety. These activities are supported by organisations such as the European Betting & Gaming Association and the International Betting Integrity Association and underline

the shared commitment to safer gambling across borders. Thanks to these organisations, Safer Gambling Week was able to take place in more than twenty European countries.

Safer Gambling Week 2024 reminded the industry of its responsibility to prioritise player safety, offering tools, resources and a collaborative platform to create a safer environment for all who gamble.