



NATIONAL
BETTING
AUTHORITY

Unified Self-Exclusion Platform

Consultation Paper

Nicosia, July 2020

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1. Introduction

Pursuant to the provisions of article 15 of the Betting Law of 2019 L.37(I)/2019, the National Betting Authority (hereafter the “Authority”) is responsible for the drafting of prevention and protection measures for players, young people and vulnerable groups of the population against addiction to betting. Part of the measures to protect the players and the society, as these are presented in the Authority’s Strategic Planning for 2020-2022, is the creation of the Unified Self-Exclusion Platform. Moreover, there is provision for the establishment of the Unified Self-exclusion platform in the Regulations for the Protection of Players, Young People and Pathologically Addicted Players, which were published for public consultation and are currently in the process of legal examination by the Law office.

The Authority with the current document, outlines basic features and functions of the platform for consultation purposes, aiming at recording feedback from licensed bookmakers, as well as from all relevant stakeholders.

2. Self-Exclusion

Self-exclusion is a process which is used as a harm minimization tool for the negative impact of excessive betting and gambling. This tool is offered by bookmakers to players who identify that their betting activity might have negative effects on their life, as well as to players who want to have a more effective and efficient control of their betting activity.

The player who wishes to be self-excluded from betting activity, either for specific or for unspecified time, submits a request for voluntary self-exclusion to the bookmaker. The bookmaker is responsible to grant the player's request immediately, but it is up to the player whether to follow the self-exclusion process.

The self-exclusion process indicates that the player fully or partly recognizes that their betting activity has exceeded the personally set limits, with potential negative consequences. In addition, the player takes personal responsibility of dealing with this issue by voluntarily using the self-exclusion tool. According to relevant studies, self-exclusion process may be used as a counseling tool, referring players to specialized counselors for counseling or even treatment¹.

Self-exclusion is a tool available to the player so as to decrease the negative effects of betting and gambling and to control their betting activities. Other such tools are setting money and time limits, as well as "time-out" or cooling off period. Enrolling on the self-exclusion platform is the last step, after the other responsible gambling tools have been implemented without granting the player full control of their betting behavior.

It is imperative that licensed bookmakers facilitate the processes that prevent any kind of problem gambling behavior among players. For instance, there should be adequate information on responsible gambling, access to betting behavior control tools, as well as efficient monitoring of players gambling behavior for early detection of problematic behaviors. Access to the self-exclusion tool promotes responsible gambling as part of licensed bookmakers' social responsibility.

Best practices from other countries refer to a comprehensive/unified platform that allows players to be self-excluded from multiple betting and gambling services as a more effective method of self-exclusion^{2,3}.

Some significant factors that need to be taken into consideration in the establishment of the self-exclusion platform are the following:

- **Player's Registration:** Player's registration on a self-exclusion platform is voluntary and the implementation of this tool derives from the player's personal responsibility. Hence, the player's registration process should be simple, user-friendly and fast.

¹ Robert Ladouceur & Lia Nower (2007) Self-exclusion: A Proposed Gateway to Treatment Model, *International Gambling Studies*, 7:1, 59-71, DOI: 10.1080/14459790601157830

² Parke, J., & Rigbye, J. (2014). *Self-Exclusion as a Gambling Harm Minimisation Measure in Great Britain: An Overview of the Academic Evidence and Perspectives from Industry and Treatment Professionals*. London: Responsible Gambling Trust.

³ <https://www.spillemyndigheden.dk/en/rofus#rofus->



- Adequate Information: The player should be adequately informed on the existence of the platform mainly from licensed bookmakers and from public awareness campaigns.
- Counseling/Access to Treatment: Self-excluded players who are referred to counselling and treatment services should also be offered proper guidance and incentives.

3. Player's Unified Self-Exclusion Platform

The National Betting Authority intends to create a Unified Self-Exclusion Platform, aiming at protecting both players and the wider public. The purpose of the Unified Self-Exclusion Platform is to provide access to a strong tool in order to empower players who acknowledge their problematic betting behavior and help them prevent any kind of pathological behavior. Consequently, players and vulnerable groups are protected, enhancing a healthy social structure.

Licensed bookmakers who are obliged to participate in the Unified Self-Exclusion Platform are:

- Licensed Class B bookmakers (online betting)
- Licensed Class A bookmakers (land-based betting) who exclusively apply player identification systems

The Unified Self-Exclusion Platform will allow a player to register on this service to automatically be self-excluded from all bookmakers who participate in the platform as described above. Therefore, if a player has an account with more than one licensed bookmakers, a single registration on Unified Self-Exclusion Platform will apply for all licensed bookmakers.

Participation on the platform is mandatory for licensed Class B bookmakers and licensed Class A bookmakers (who apply the player identification system). Licensed bookmakers will be allowed a period to convert and adjust their software systems, in order to make them compatible with the platform.

Registration to the platform will be open for Cypriot citizens, and people from EU and non-EU countries who are over 18 years old and who participate or intend to participate to betting activities with licensed bookmakers within the Republic of Cyprus.

4. Operational System – Descriptors

The current document sets the basis and requirements for the development of a system which will serve the purpose of the Unified Self-Exclusion Platform. The system will be developed at a next stage based on stakeholders' feedback.

The ownership and management of the Unified Self-Exclusion Platform will belong to the Authority. The Authority will collect and process the personal data of people who will register on the platform, following the EU General Data Protection Regulation (GDPR).

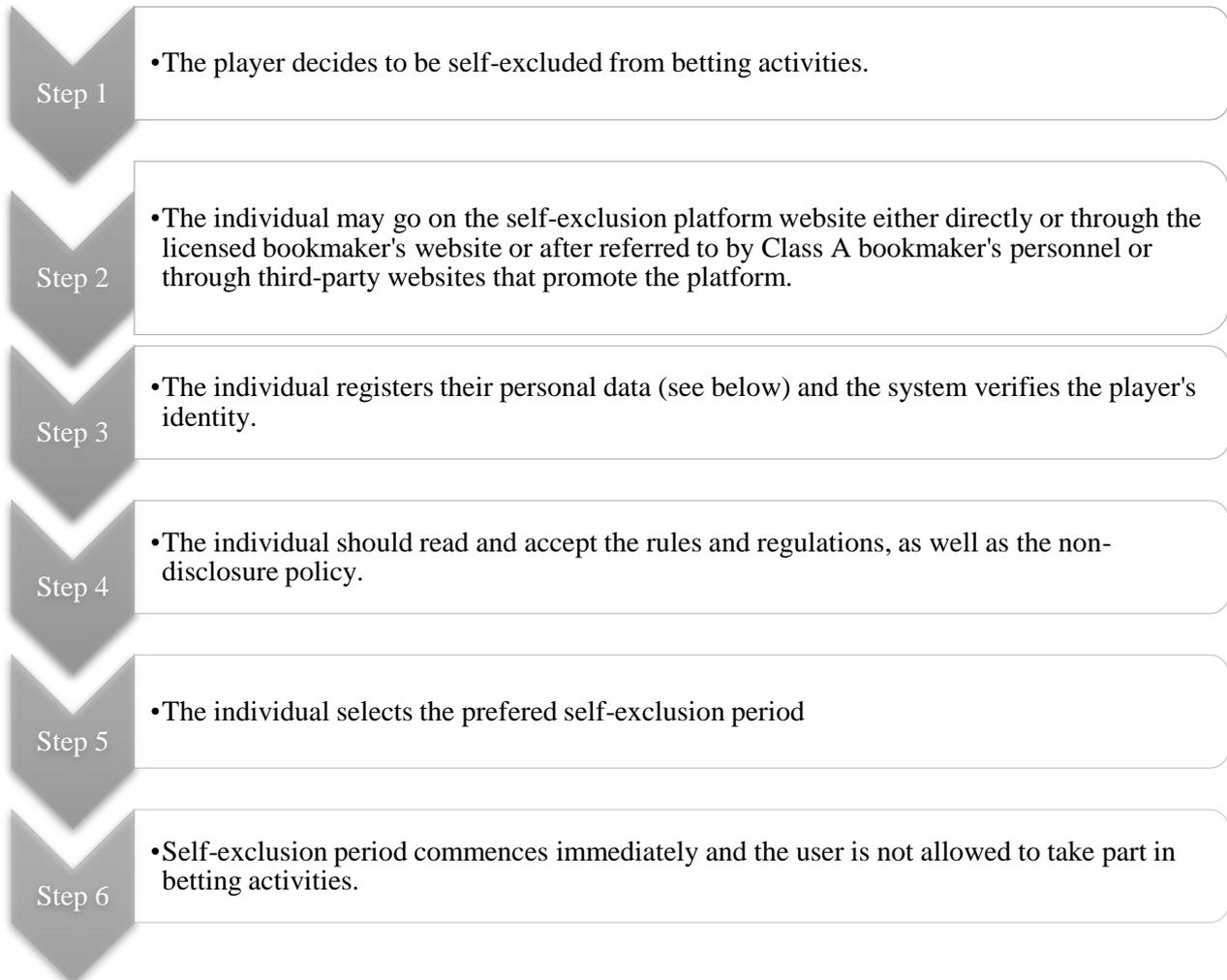
In order to ensure the usefulness and effectiveness of the Unified Self-Exclusion Platform, the following principles and conditions should apply:

- Development of a user-friendly interface, that will allow easy registration with a few clicks
- Visible link on Class B licensed bookmakers' website that will redirect the player to the Unified Self-Exclusion Platform, as well as noticeable display of signs at Class A licensed premises that will refer the player to the Platform
- Accurate verification and identification of the person who registers on the platform, as well as provision for a regular data verification
- Creation of interface that will allow licensed bookmakers to verify data of individuals who register for their services
- Strict non-disclosure policy and operation of the platform following the EU General Data Protection Regulation
- Individuals should be able to register on the system without having to be registered players with a licensed bookmaker
- Display of adequate information on counseling and treatment on the Unified Self-Exclusion Platform
- Integration of the system on the Authority's betting monitoring reporting system



4.1. Registration on the General Self-Exclusion Platform

Individual registration on the platform should be done in the following way:



Note: the player will be allowed to register through the bookmaker's website. The bookmaker's data on players should be integrated in the Authority's platform.

4.2. Personal Data and Database

The user should fill in the following mandatory fields with their personal data:

- Name and surname
- Home address
- Email address
- Phone number
- Date of birth
- Identification document (identity card / passport)
- Identification document number

4.3. Personal Data Verification

Once the user is registered on the platform, the software will automatically check for the accuracy of the personal data. The first step will be the verification of the email address or the phone number using a verification code sent via email or sms.

Following this, personal data verification will be conducted through a specialized software.

4.4. Data Modification

Users will be able to add further data, e.g. additional addresses, names, etc. However, they will not be able to alter basic data, such as date of birth and identification document number.

It should be noted that the Authority, being the data controller, will define a strict non-disclosure policy following the requirements of GDPR.

Each player's data will be encrypted in a unique user number that will be used for control purposes and will be stored in the Authority's database. The user's personal data will be verified and compared to the Authority's betting monitoring reporting system, which saves players' personal data in the form of a unique user number, based on the user's identification document. Once the player's personal data is verified with the betting monitoring reporting system (where applicable), licensed bookmakers will be informed accordingly.

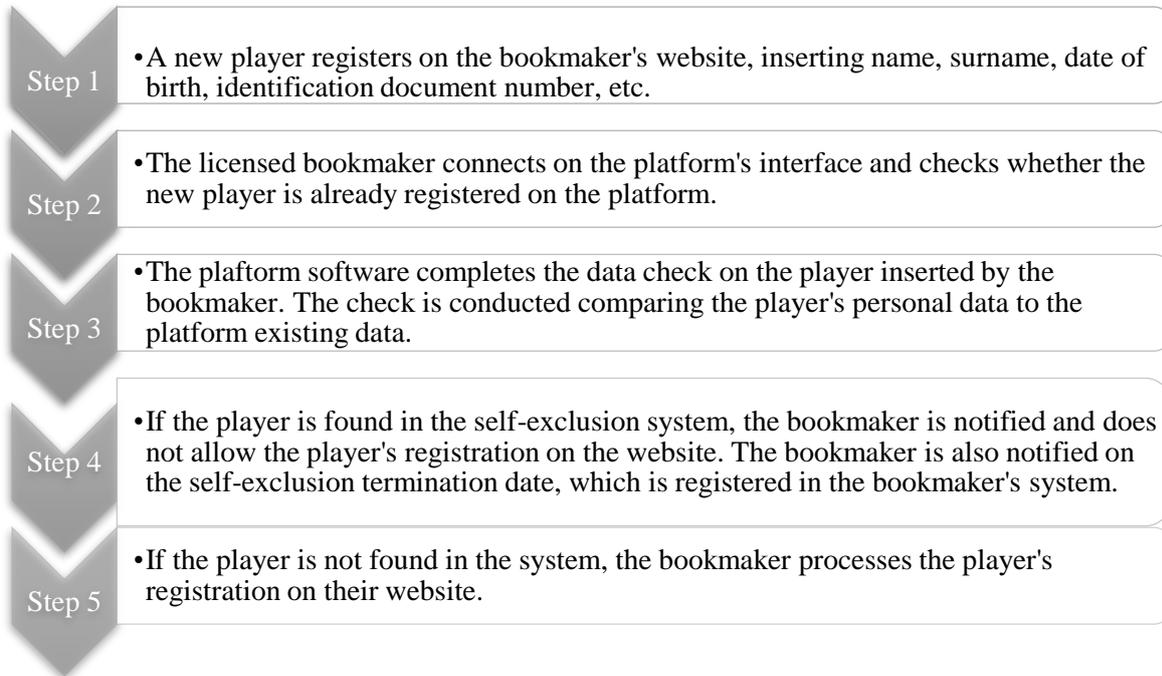
It should be noted that, at the beginning of the operation of the Unified Self-Exclusion Platform, licensed bookmakers should provide the Authority with all encrypted data of current players who have requested self-exclusion, as well as the requested period, in order for the platform to be updated.

Moreover, Class B licensed bookmakers should transfer any remaining amount of money in the account of the player who has requested self-exclusion within five days.



4.5. Access of Licensed Bookmakers on the Platform

During the registration of a new player on their website (or on their company in the case of Class A bookmakers who participate of the platform), licensed bookmakers should connect to the Unified Self-Exclusion Platform so as to check whether the potential player is registered on the platform. This process will be conducted by licensed bookmakers in the following way:

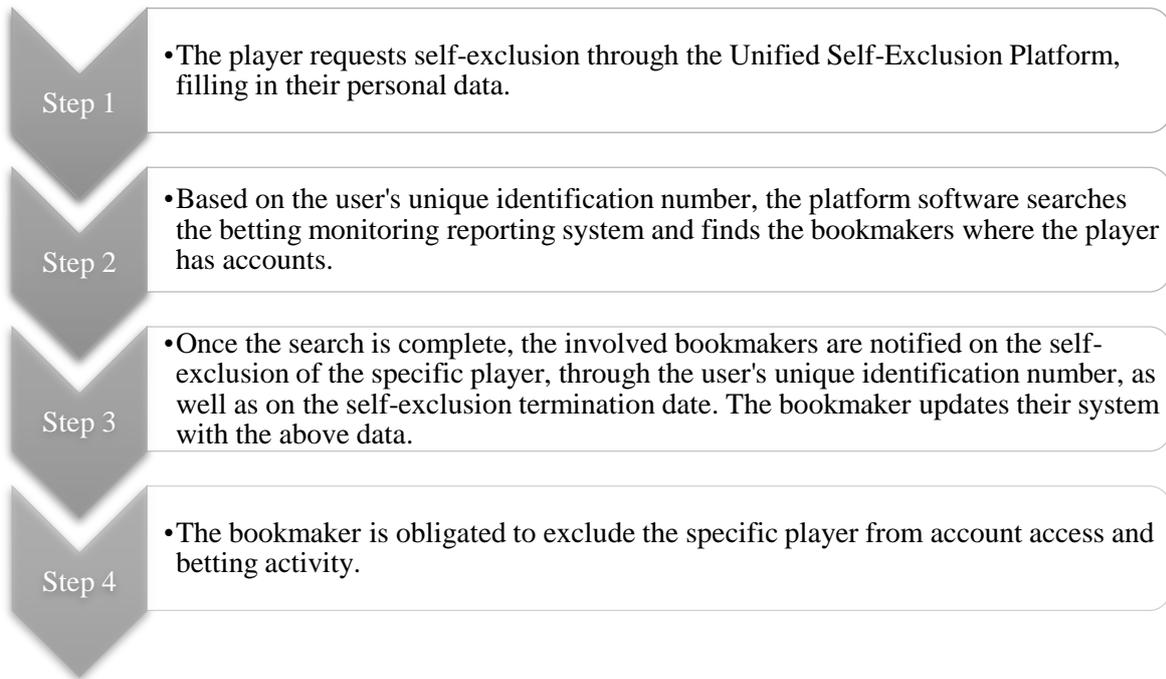


The above process also applies for Class A bookmakers who participate on the platform, when a new player registers for Class A bookmaker services. Class A bookmaker is responsible to conduct the necessary platform check as described above.



4.6. Data Transfer from the Platform to Licensed Bookmakers

In the case that a player has a registered account in more than one licensed bookmakers and decides to request self-exclusion on the Unified Self-Exclusion Platform, the following procedure should be followed:



5. Self-Exclusion Termination

Temporary time-out or self-exclusion of a player, pursuant Regulations 36 and 40 of the Authority's Regulations for the Protection of Players (which are being finalized), is automatically lifted upon completion of the interruption or self-exclusion period without any additional action required by the player. It should be noted that, the player may not request an earlier termination of the initially requested self-exclusion period.

Hence, according to the above mentioned procedures, the bookmaker is informed on the self-exclusion termination date for each player, and lifts the exclusion automatically.

6. Advertising and Promotion

Licensed bookmakers who participate on the Unified Self-Exclusion Platform should take all necessary measures to prohibit sending any kind of promotional and advertising material related to betting activity to all players who are registered on the Unified Self-Exclusion Platform. Therefore, they should frequently update their marketing lists, excluding people who are registered on the Unified Self-Exclusion Platform.

**In case of discrepancy between English and Greek version, the Greek version supersedes*