

# Safer Gambling Strategy

2022 - 2025



# Safer Gambling Strategy for 2022 - 2025

The road to a public  
health approach  
in Cyprus

May 2022



NATIONAL  
BETTING  
AUTHORITY



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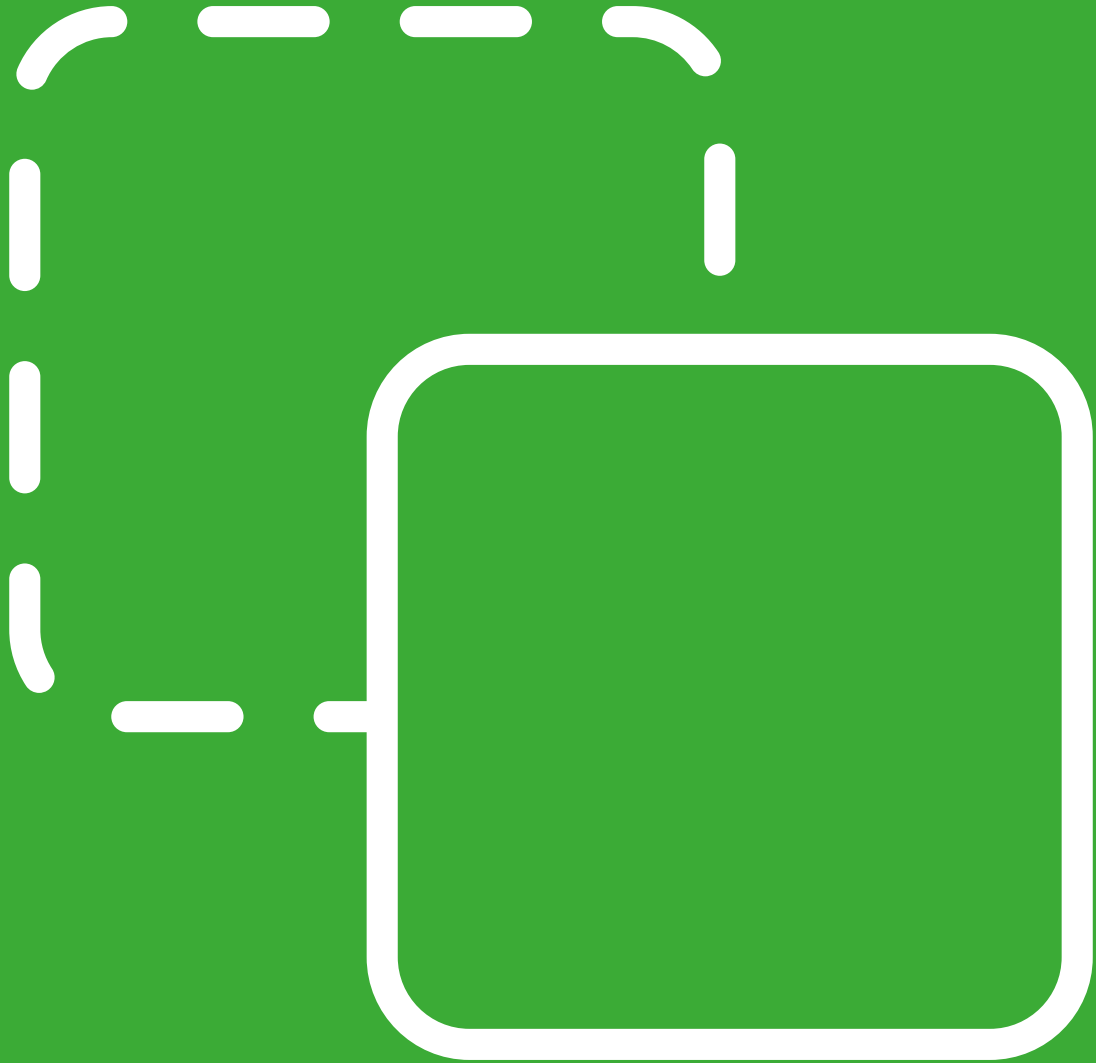
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# Background



# The National Betting Authority



The National Betting Authority (Authority or NBA) was established in 2012 as a legal public entity, currently governed by the Betting Law 37(I)/2019 which came into effect in March 2019 (formerly governed by Betting Law 106(I)/2012).

The Authority is responsible for the regulation, supervision, and monitoring of the betting activity in the Republic of Cyprus. This includes issuing Class A (land-based betting) and Class B (online betting) licenses to bookmakers and authorised agents, on-site inspections, licensees' supervision, as well as drafting and issuing Directives and regulations that facilitate law implementation. <sup>1</sup>

## The Authority ensures that: <sup>1</sup>

- 1 Betting activity is legal and complies with regulations
- 2 Winnings are paid to the players, taxes are paid to the government, and contributions are submitted to the Authority
- 3 Money laundering and terrorist financing are efficiently deterred
- 4 Licensees comply with laws and regulations

5

All the relevant Directives are issued and applied

The Authority works with various governmental and international institutions on topics related to gambling and its responsibilities. Implementation of preventive measures for the protection of young people and vulnerable groups from the harms related to betting<sup>1</sup> is another main responsibility of the Authority.

**The Authority is driven by its vision and mission which governs its actions and objectives for safer gambling:**

**Vision:** establish Cyprus as a fair, transparent, and safe environment of development and innovation in the gambling sector, while focusing on the protection and interest of society as a whole

**Mission:** contribute to public health, safety, and welfare in regard to safeguarding an environment of safer gambling practices and focusing on protecting players and society from any harms related to gambling

# Using a Public Health Lens to Address Gambling-Related Harms in Cyprus



The Authority's main objective is to safeguard players and society from gambling related harm while fostering and supporting a sustainable gambling sector. To achieve this goal, the NBA developed the Responsible Gaming Action Plan for 2018–2022, outlining the Authority's strategic direction regarding responsible gambling and minimising the negative effects of problem gambling. The goal of this Action Plan was to set principles and guidelines for the implementation of various initiatives and the coordination of partnerships between stakeholders regarding responsible gambling. This Action Plan was the NBA's first effort to establish a structured framework for the prevention of gambling harm and protection of society from problem gambling.

The Responsible Gaming Action Plan for 2018–2022 mobilized efforts to protect people who are at-risk of and experiencing problem gambling in Cyprus by delivering valuable prevention, education, and treatment initiatives in support of consumer and public protection. A public health lens reveals new and vital evidence-based ways to build on the efforts to date to support safer gambling for the broader population.

Gambling is a public health issue with potential benefits and risks that impact communities, not just individuals.<sup>2</sup> Worldwide,

jurisdictions are increasingly adopting a public health approach to gambling<sup>3</sup> and are seeing promising results, including reducing gambling harms and inequalities.<sup>4-7</sup> The Authority strives to incorporate this approach into its strategy to reduce gambling harm and create the conditions for the safe and sustainable future of gambling.

Keeping players and communities safe while realizing the social and economic benefits of gambling is at the heart of a public health approach to safer gambling.<sup>8</sup> Since the introduction of the first Responsible Gaming Action Plan, the adoption of a safer gambling lens has increased globally.

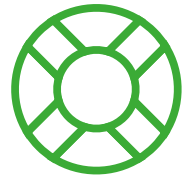
The idea of “responsible gaming” suggests players are primarily responsible for protecting themselves, whereas “safer gambling” acknowledges that in addition to individual responsibility, it is also the responsibility of the state and its institutions, gambling operators, and all stakeholders involved to ensure the external factors that can negatively impact people who gamble are addressed. Safer gambling is rooted in a public health approach which aims to reduce harms from gambling across society.

The Authority has drafted its Safer Gambling Strategy for 2022–2025 (hereinafter referred to as the “Strategy”) to build and improve upon its previous strategic plan and taking into consideration the shift towards a public health approach to gambling harm. The Strategy is evidence-based, makes good use of best practices, and includes a measurement framework that supports quantifying, monitoring, and evaluating the effectiveness of the strategic actions and initiatives taken to enact the Strategy. Action plans that complement the Strategy will outline the priority areas, initiatives, and key indicators for monitoring the success and effectiveness of the initiatives for each year.

This new strategic approach is fundamental for the Authority to progress its vision and mission of a fair, transparent, and safe gambling sector focused on reducing gambling-related harms. In the section that follows, a summary of key evidence supporting a public health approach to gambling harm reduction is provided.



# The Evidence Supporting a Public Health Approach to Gambling



The “Gambling and Health Framework” created by Korn and Shaffer in 1999 is the seminal framework to describe gambling from a public health perspective.<sup>9</sup> This framework brought together the findings from emerging research in the early 1990s regarding the intersection between gambling and public health, and linked them to established public health strategies.<sup>3</sup> Several other well-known frameworks have followed, including the Conceptual Framework of Harmful Gambling.<sup>10</sup>

**Public health approaches to gambling reflect an evolution in the understanding of gambling-related harms in four main ways:**

1

Drivers of gambling harms are complex, and many occur outside of an individual’s direct control<sup>3, 11</sup>

2

There are individual, community, and societal benefits and costs to gambling<sup>12</sup>

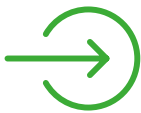
3

Prevention and treatment strategies should target all levels of harms<sup>8, 13</sup>

4

Preventing and reducing gambling-related harms requires collaboration<sup>9, 14, 15</sup>

**Details for each are outlined.**



**Drivers of gambling harms are complex, and many occur outside of an individual's direct control**

Complex and diverse factors beyond individual choice influence decisions to gamble.<sup>3</sup>

**The factors that impact people's risk of experiencing gambling harms that reside outside of their direct control include:**

1

social factors (e.g., socio-economic status),

2

cultural factors (e.g., beliefs about gambling and associated shame and stigma), and

3

environmental factors (e.g., where and how policies allow gambling to be offered)<sup>8</sup>

These factors, which are rooted in the social determinants of health and public policy, can create health inequities which place some people and groups at higher risk of experiencing harms relative to others. For instance, it has been found that those with lower income, certain ethnocultural communities, and those living in communities with a high density of gambling outlets are at higher risk of experiencing gambling-related harm.<sup>16</sup> Evidence suggests that gambling harms disproportionately affect individuals and groups experiencing health inequities relative to those without.<sup>17, 18</sup>

A public health approach is an organized, comprehensive, and multi-sectoral effort to address the broader social, cultural, and regulatory environment in which gambling behaviour occurs.

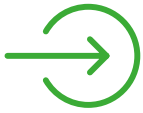


## **There are individual, community, and societal benefits and costs to gambling**

A public health approach recognizes that gambling harm is not limited to individual players and people with problem gambling. Individuals, groups, and whole communities can experience harms directly or indirectly related to gambling.<sup>11</sup>

Individuals can experience financial harms, relationship harms, harms to physical health and wellbeing, cultural harms, reduced performance at work/school, and criminal activity.<sup>11</sup> Friends and families of people who gamble can also experience harms, including but not limited to: relationship difficulties, poor mental health, financial abuse, and intimate partner violence.<sup>19</sup> Communities also bear the costs of the harms experienced by individuals and families because they provide the health, social, and legal services and resources to support them.<sup>19</sup> They also bear costs in the form of crime, decreased work productivity, and a reduced sense of community togetherness.<sup>19</sup>

The widened lens of a public health approach informs prevention, treatment, and support strategies that aim to reduce gambling harms for individual gamblers, friends, family, and communities.



## Prevention and treatment should target all levels of harms

The evidence is now clear that gambling-related harms can occur at all levels of gambling spanning from low-risk to problem gambling.<sup>20-22</sup> While people with problem gambling experience more severe harms relative to people with lower-risk gambling, only a very small percentage of the population experience problem gambling.<sup>20-22</sup>

This means that the total burden of gambling-related harm (health, emotional, financial, performance at work or study, relationship, and neglect of family and friends) from low- and moderate-risk gambling is higher, given this group represents a significantly larger proportion of the population.<sup>13</sup>

In addition to the large total burden of gambling-related harm they represent, people who gamble at low-risk and moderate-risk are increasingly of interest because of their risk of transitioning to problem gambling.<sup>23</sup>

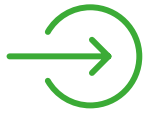
### The three pillars of prevention are essential for a public health approach to gambling:<sup>8</sup>

**Primary:** preventing harms from occurring in the first place in low-risk gamblers

**Secondary:** preventing the escalation to severe harms in moderate-risk gamblers through early intervention

**Tertiary:** providing treatment and supports to high-risk gamblers experiencing significant harms

While ensuring a robust implementation of all three pillars of prevention is critical to addressing all levels of gambling-related harms, a public health approach acknowledges that strengthening upstream strategies to prevent harms can reduce downstream harms from occurring in the first place.<sup>3</sup>



## **Preventing and reducing gambling-related harms requires collaboration**

Addressing the complex factors that influence gambling-related harms requires effective coordination across diverse stakeholders to identify and respond to system gaps in prevention and treatment strategies.<sup>9, 14, 15</sup> A collaborative system-level approach produces more effective, efficient, and sustainable outcomes relative to the siloed efforts by many single organizations.<sup>24</sup>

Strategic partnerships between well-positioned community and health stakeholders both within and outside of the typical gambling stakeholders and industry can reveal context-specific ways for communities to address harms.<sup>9, 14, 15</sup> Bringing stakeholders together to support a shared vision also challenges them to consider diverse ways of applying policy and intervention options to address gambling-related harms.<sup>25</sup> A public health approach brings together community resources and supports collaboration intended to address the range of harms, where they happen, and to whom.<sup>3</sup>

# How a Public Health Approach allows the Benefits of Gambling to be Realized



Gambling is a recognized form of recreation and entertainment, and a critical source of revenue to fund important health and social services.<sup>26, 27</sup> Adopting a public health approach to gambling harm reduction can lead to community-wide protections and benefits, and could support a safer and more sustainable gambling sector.<sup>8, 28, 29</sup>

The majority of people who gamble do so as a form of entertainment.<sup>30</sup> Gambling may be considered a recreational activity that allows for entertainment, play, and socialization in a safe environment.<sup>26</sup> People who gamble recreationally report a number of benefits from gambling, including entertainment, fun, excitement, the social aspect, a sense of connectedness and belonging, stress relief, and relaxation.<sup>26, 31, 32</sup> Recreational gambling has also been associated with general wellbeing and enhanced perceived quality of life.<sup>26, 32, 33</sup>

Societal and community level benefits of gambling include: increased government and tax revenue, increased per capita income, stimulated economic growth, and a modest, positive, short-term impact on employment rates (both in the gambling industry specifically and other sectors that rely in part on

revenue from gambling, and, in some instances, a modest impact on hospitality and entertainment wages).<sup>30, 33, 34</sup>

Stakeholders have a vested interest in creating a sustainable industry in which safer gambling is at the forefront. Gambling operators are in a unique position to support and benefit from creating the conditions for safer gambling behaviour in their customers. Players are increasingly expecting operators to support safer gambling behaviours.<sup>35</sup> By championing the adoption of a public health approach to safer gambling, operators can support safer gambling behaviour that in turn creates satisfied players that become loyal customers to the operator.<sup>31</sup>

Operators who go above and beyond to signal their responsibility in supporting safer play can differentiate themselves from their competitors, gaining competitive advantage and boosting customer loyalty.<sup>35</sup>

# Safer Gambling Strategy for 2022-2025





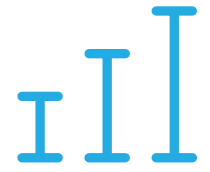
# Strategic Approach



The Authority has drafted its Safer Gambling Strategy for 2022-2025 which provides a framework for adopting a public health approach to safer gambling that will ensure players and communities are safe while realizing the social and economic benefits of gambling.<sup>8</sup>

The Strategy will guide the Authority and all stakeholders in the planning, development, implementation, and monitoring of coordinated and evidence-based initiatives and actions for reducing gambling related harm for the life of the Strategy.

# Strategic Framework



Implementation of the Authority's Safer Gambling Strategy will be guided by a framework that brings together strategy pillars and corresponding strategic priorities.

The strategic framework was developed using the best available evidence for the key components of a public health approach together with the results from an evaluation of the previous Responsible Gaming Action Plan 2018–2021.

## National Betting Authority Safer Gambling Strategic Framework

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### STRATEGY PILLARS

### STRATEGIC PRIORITIES



## Protect

To create the conditions for stakeholders to protect society from the harms related to gambling, the Strategy will:



Establish policies that guide and support stakeholders to implement public health protection measures



Incentivize stakeholders to collaborate and create more supportive and less exploitative environments for players



## Prevent

To increase awareness of gambling-related harms, safer gambling strategies, resources, and supports, to prevent gambling harm, the Strategy will:



Deliver a variety of safer gambling public health campaigns and safer gambling tools for the general population



Engage communities to develop targeted messaging and interventions for specific at-risk groups



## Support

To provide individuals affected by gambling-related harms the support they need when they need it to improve health and wellbeing, the Strategy will:



Strengthen and support pathways to treatment and stigma reduction to increase access to treatment



Support integration of screening, treatment, and supports across diverse settings and sectors



## Mobilize

To develop evidence-based and effective programs, policies, and initiatives that improve safer gambling outcomes, the Strategy will:



Support local gambling research and evaluation capacity development to deepen understanding of the context of safer gambling and gambling harm in Cyprus



Engage a broad range of stakeholders and people with lived experience (people who gamble and affected others) to collaborate, translate, and strengthen use of evidence in practice

# Strategic Priorities and Supporting Evidence



## Protect

To create the conditions for stakeholders to protect society from the harms related to gambling, the following strategic priorities have been set:

1

Establish policies that guide and support stakeholders to implement public health protection measures

2

Incentivize stakeholders to collaborate and create more supportive and less exploitive environments for players

Gambling, at all levels of risk, occurs within an environment influenced by regulatory, legislative, and commercial factors that impact the availability, accessibility, and advertising of gambling opportunities. These environmental forces occur beyond the direct control of an individual person who gambles<sup>36</sup> and are critical to address as part of a public health approach to reducing gambling harms.<sup>3</sup>

The Authority recognises that the use of protection measures requires leadership and commitment to engage the levers of legislation, regulation, and funding to prevent excess risk of gambling harms.<sup>3, 36</sup>

Protection measures recognize the duty of system stakeholders to create environments and conditions that are conducive to preventing harms from occurring.<sup>37</sup>

Health protection measures can include strategies that modify the environment by using the principles of behavioural economics.<sup>38, 39</sup> Behavioural economics are a collection of subtle, low-cost modifications to the environment that change the choice architecture available to individuals, effectively “nudging” them towards behaviour change.<sup>39</sup> This field of work recognizes that while choice is an important aspect of behaviour change, people who gamble may have gambling-related heuristics (“rule of thumb” strategies) and biases that prevent rational decision making, and subsequently health-promoting behaviours.<sup>39</sup>

By creating friction between people who gamble and less desirable behaviours, these strategies provide an opportunity to move from an impulsive to a more rational state, which increases the likelihood of choosing health-promoting behaviours.<sup>39</sup>



## Prevent

To increase awareness of gambling-related harms, safer gambling strategies, resources, and supports, as well as prevent gambling harm from happening, the following strategic priorities have been set:

- 1 Deliver a variety of safer gambling public health campaigns and safer gambling tools for the general population
- 2 Engage communities to develop targeted messaging and interventions for specific at-risk groups

Prevention of gambling-related harms is best approached using the three tiers of prevention—universal, selective, and targeted—to prevent and reduce harms at all levels of gambling risk.<sup>40, 41</sup> Universal prevention strategies make use of ‘universal measures’ to prevent harms from occurring in people who gamble at a low-risk, recreationally, and in people who do not gamble.<sup>8</sup> Universal measures use messaging and education that are appropriate for (and resonate with) the general population, such as public awareness campaigns.<sup>15</sup> Selective prevention strategies make use of ‘selective measures’ to mitigate or reduce harms in those identified as being at-risk<sup>8</sup> which may include risks due to social, environmental, psychological, or biological factors.<sup>15</sup> Targeted prevention is delivered via treatment and support channels to those experiencing harms<sup>8</sup> and is addressed within the strategic pillar support.

## Implementing effective universal and selective measures to prevent harms requires:

- 1 Acknowledgement of the complex interplay between the social determinants of health, individual behaviours, and systemic factors that influence the likelihood of experiencing gambling harms <sup>42</sup>
- 2 Cross-sectoral partnerships to deliver numerous multi-pronged interventions simultaneously at the individual and community level <sup>15, 41</sup>
- 3 Focused initiatives to prevent harms in higher risk groups <sup>8</sup>

It is important that prevention approaches and targeted messages should be tailored to address the wide range of social, environmental, psychological, or biological factors for each target group.



## Support

To provide individuals affected by gambling-related harms the support they need when they need it to improve health and wellbeing, the following strategic priorities have been set:

1

Strengthen and support pathways to treatment and stigma reduction in order to increase access to treatment

2

Support integration of screening, treatment, and supports across diverse settings and sectors

Targeted prevention involves providing treatment and support to those experiencing harms.<sup>8</sup> While the majority of public health efforts should be directed to preventing or mitigating the risk of harms at early stages, the treatment of harmful gambling through targeted measures is a fundamental part of reducing gambling harms through a public health approach.<sup>43</sup> Targeted measures provide targeted prevention strategies to those currently experiencing increased levels of gambling harms.<sup>43</sup> These can be provided to both individual people who gamble as well as affected others, such as friends and family.<sup>44</sup>

Individuals and affected others may experience one or more of the following harms: financial harms, relationship harm (including intimate partner violence<sup>45</sup>), emotional harm, negative impacts on physical and mental health, cultural harm, reduced work or study performance, and harms related to criminal activity.<sup>11</sup> Strengthening pathways to treatment is critical with as little as



3% of people with problem gambling seeking treatment in some jurisdictions.<sup>46</sup> Barriers to seeking treatment include denial of the problem, shame and stigma, lack of awareness of supports, and lack of available services.<sup>47, 48</sup>

While affected others represent over half of the total burden of gambling harms, they are significantly under-represented in gambling support services.<sup>44</sup> It is uncommon for affected others to seek support, and they may only do so when prompted by severe emotional distress, financial concerns, or worries that the problem will worsen.<sup>49</sup> Shame and fear of stigmatization are the common reasons that affected others do not seek help.<sup>50, 51</sup>

It is important to coordinate targeted measures and initiatives to ensure the appropriate management of gambling harm across health, financial, counselling, and other community services.<sup>15</sup> Coordination and integration of screening, treatment, and support services across diverse health, care, and social support settings, and within existing local public health mandates can improve treatment access and outcomes for those experiencing harms.<sup>52, 53</sup>

All mental health and behavioural issues, including gambling, have multiple causes and symptoms, and should therefore be screened for at multiple points of entry in the health and social care sector.<sup>15, 43</sup> Similarly, anyone in treatment for harmful gambling should also be assessed for co-occurring mental-health issues.<sup>43</sup>



## Mobilize

To develop evidence-based and effective programs, policies, and initiatives that improve safer gambling outcomes, the following strategic priorities have been set:

1

Support local gambling research and evaluation capacity development to deepen understanding of the context of safer gambling and gambling harm in Cyprus

2

Engage a broad range of stakeholders and people with lived experience (people who gamble and affected others) to collaborate, translate and strengthen use of evidence in practice

Evidence-informed decision making is critical to implement effective programs, policies, and initiatives to reduce gambling harms.<sup>43</sup> The development of research and evaluation programming is vital to support ongoing, systematic, and transparent evidence-based decisions that improve outcomes for citizens.

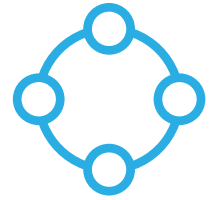
High-quality research is required to inform harm reduction strategies while evaluation activities should be used to determine whether the strategies deployed achieved their intended impact.<sup>15, 54</sup> Investing in research and evaluation programming with clearly articulated priorities<sup>54</sup> in alignment with strategic plans can help determine risk and protective factors, trends in prevalence and incidence of gambling-related harm, and effective approaches to prevention and treatment.<sup>54</sup>

Additionally, research and evaluation programs should be designed with embedded knowledge translation activities to reduce the lag time that commonly occurs for research findings to be translated into public health policy.<sup>43</sup>

A robust program of research considers the broader societal experiences of gambling. Past gambling research has focused on individual experiences and characteristics of people with disordered gambling, which results in too little being done in the areas of prevention, education, and consumer protection.<sup>43, 54</sup> Applying a broader population-wide lens to explore how gambling is interconnected with the social determinants of health is foundational to adopting a public health approach to gambling.<sup>43</sup>

Evaluating safer gambling programs, interventions, and pilot projects are essential to assessing the effectiveness of interventions, to know what works and what does not work in practice across different contexts.<sup>54, 55</sup> Evaluation activities need to be embedded into the design and implementation of public health initiatives to achieve evidence-based practice.<sup>56</sup> Developing the capacity and infrastructure to continuously monitor and evaluate targeted outcomes, and the efficacy of any implemented strategic initiatives is critical to supporting evidence-informed policies and practices.<sup>43</sup>

# Stakeholder Collaboration to Deliver the Strategy



Consistent, meaningful, and innovative collaboration amongst our stakeholders is essential for ensuring the Strategy priorities are realized. Collaboration across diverse sectors within and outside of typical gambling stakeholders and industry<sup>3</sup> will produce significantly more impact in moving the needle in reducing harms from gambling. Built upon a shared vision, collaboration will leverage stakeholders' unique positioning to effectively identify and respond to prevention and treatment strategies<sup>9, 14, 15</sup> to produce coordinated and impactful outcomes.<sup>24</sup>

The Authority defines its stakeholders as individuals or legal entities which interact with and affect, but are also affected by, the Authority's safer gambling strategy.

**Stakeholders who will play a pivotal part in helping realize the objectives of the Safer Gambling Strategy include, but are not limited to:**



Licensed bookmakers and authorized agents and other stakeholders in the gambling industry



Players and their affected others

- 3 Public sector services and other regulatory authorities
- 4 Non-Governmental Organizations (NGOs) and other organized social groups
- 5 Underaged, young people, and other vulnerable social groups
- 6 Media
- 7 Research and academic centers
- 8 The Authority's staff

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