

The Danish Gambling Authority's guide on responsible gambling



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Version history

Version	Date	Short description of amendments
1.1	2 January 2020	
1.2	25 November 2020	
1.3	6 September 2021	Amendments to section 4 regarding technical requirements for analysis of game data, including an amendment of which markers that we suggest are used for the analysis of game data. In this connection, it is specified that demographic data such as age, sex, ethnicity, geographical location etc. cannot be interpreted as game data. The Danish Gambling Authority has amended the guide in this aspect in relation to previous versions and we, of course, accept that it takes some time to change.
1.4	6 December 2022	<p>Amendments to section 2 regarding general information about responsible gambling, including updates of data from the latest prevalence study and guide to licences holders' use of ROFUS registrations.</p> <p>General amendments to section 3, among other things regarding information to players and the Danish Gambling Authority's labelling scheme. Among other things, there is supplementary information about deposit limits for online casino and betting. For land-based casinos there is supplementary guidance on information to players and marketing in connection with self-exclusion.</p> <p>Amendments to section 5 regarding the duty to pay attention and interventions concerning players including supplementary guidance on VIP schemes and use of bonus offers, among other things.</p> <p>Additionally, the guide has been generally revised.</p>

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1 Introduction

This guide is aimed at licence holders and other relevant stakeholders. The guide reviews the responsible gambling requirements placed on licence holders stated in the Danish Act on Gambling and related executive orders.

In addition to reviewing the specific rules, the guide provides guidelines to and interpretations of what licence holders more specifically must do to comply with the obligations about responsible gambling. In the areas where it is left to the licence holders to make an estimate, the guide contains instructions on how the rules may be met.

The guide also provides the background for responsible gambling and explanations for why responsible gambling is so crucial, when providing gambling products.

The guide is divided into general topics that apply to all licence holders, and under the individual sections divided according to the different gambling sectors. Chapters 4 and 5 specifically concerns the duty to pay attention, which appears from section 16(1) of the Executive Order on betting and section 22(1) of the Executive Order on online casino. The technical requirements for compliance with the duty are reviewed in chapter 4, while chapter 5 sets out guidelines on how the interventions in relation to players displaying problematic gambling behaviour are complied with. Please note that in the end of each chapter, there is also a section addressed to the land-based market.

The guide is specifically produced based on the executive orders for the various gambling sectors that entered into force on 1 January 2020. The executive orders contain a number of provisions that specifically relate to responsible gambling. The rules of the executive orders have been made in the light of "Agreement on new initiatives against compulsive gambling and adjustments to the gambling agreement" of 29 June 2018. The agreement was signed by the government at the time (Venstre, Liberal Alliance, and Konservative) and Socialdemokratiet, Dansk Folkeparti, Radikale Venstre og Socialistisk Folkeparti.

It should be noted that many marketing rules are based on the consideration for responsible gambling. The rules governing the requirements that licence holders must comply with when marketing their products are not covered by this guide. Please see the Danish Gambling Authority's guide on sales promoting arrangements which takes effect on 1 January 2020.

It should also be noted that part of the rules and the assessment that underlie whether the licence holders provide gambling in a responsible manner, in some respects overlaps with the rules on prevention of money laundering and financing of terrorism. Licence holders may therefore benefit from merging the two areas and keeping themselves informed in the Danish Gambling [Authority's guidance on preventive measures against money laundering of criminal proceeds and financing of terrorism](#), when reviewing responsible gambling procedures.

The guide is available in English on spillemyndigheden.dk/en. However, the Danish Gambling Authority emphasise that in case of any discrepancy between the original Danish text and the English translations of the guide, the Danish text shall prevail.

The guide is regularly updated as rules and practices are added or amended and developed. The most important amendments as regards to content will appear from the version history.

2 General information about responsible gambling

2.1 The legislative intent of the Danish Act on Gambling

Among the purposes of the gambling legislation is that games are provided in a responsible manner. This appears from the Danish Act on Gambling section 1:

Section 1. The purpose of the law is:

- 1) to keep the consumption of gambling products at a moderate level,
- 2) to protect young people and other vulnerable persons from being exploited through gambling or developing a gambling addiction,
- 3) to protect players by ensuring that gambling is provided in a fair, responsible and transparent manner, and
- 4) to ensure public order and to prevent gambling from being used for criminal purposes.

The provision is a declaration of intent. This means that the law must be administered in consideration of the stated purposes. Violation of section 1 of the Danish Act on Gambling is not in itself penalised, but the legislative intent will be included in the interpretation of the additional provisions of the gambling legislation and in any discretionary assessments. This means that when the Danish Gambling Authority assess whether a licence holder meets the various requirements in the Danish Act on Gambling, then the purpose of the Act will be included in the assessment. This assessment will be of significance for any decision made by the Danish Gambling Authority, including decisions on police reports as well as decisions on the issuance and revocation of licences. This means, among other things, that a licence to provide gambling products, covered by the Danish Act on Gambling, cannot be issued if the Danish Gambling Authority assess that the issuance of a licence will counteract the purpose of the Act.

The purpose of keeping the consumption of gambling products at a moderate level means that licence holders must be pay attention to the individual player's gambling spend and make sure that players do not spend more than they can afford, among other things.

The purpose of protecting young people and other vulnerable persons from being exploited through gambling or developing a gambling addiction, among other things, means that licence holders are obligated to both prevent problem gambling and compulsive gambling as well as identify and help the players who may be affected by problematic gambling.

'To protect players by ensuring that gambling is provided in a fair, responsible and transparent manner' makes demands on licence holders' marketing, among other things. In this connection, specific requirements for the marketing of gambling products have been stipulated in the various executive orders. For more information, please read the Danish Gambling Authority's guide on sales promotion.

'To ensure public order and to prevent gambling from being used for criminal purposes' means that licence holders have a number of obligations to prevent money laundering and financing of terrorism. This is regulated in the anti-money laundering legislation. For more information, please read the legislation and [the Danish Gambling Authority's guide on preventive measures against money laundering and financing of terrorism](#).

2.2 Problematic gambling

2.2.1 General information about problematic gambling

One of the main purposes of the Danish Act on Gambling is, as discussed above, to ensure responsible gambling. This is largely done by preventing problematic gambling. Problematic gambling is an umbrella term that denotes a spectrum of inappropriate gambling behaviour. The spectrum is typically divided into three levels with compulsive gambling being the most severe condition.

At-risk gambler – a player with an increased risk of developing a problematic gambling behaviour compared to the majority of players. An at-risk gambler gambles regularly and according to a schedule and is more willing to take risks. However, gambling does not affect the at-risk gambler's everyday life.

Problem gambler (high-risk gambler) – a player whose gambling causes problems, but the player still has some control. The problem gambler typically spends a lot of money and time gambling and planning his or her gambling strategy.

Compulsive gambler – a player whose gambling has serious consequences for the player's life and whose gambling has become an addiction resulting in functional impairment on various parameters.

In a clinical context, the compulsive gambling diagnosis is made based on one of the official diagnosis systems, ICD 11, administered by the World Health Organisation (WHO), or DSM-V administered by the American Psychiatric Association (APA). During the clinical diagnosing, it is, among other things, eliminated that the gambling behaviour is due to a manic (bipolar) disorder.

In the ICD-11, compulsive gambling is classified as a non-substance, behavioural addiction sharing similarities with disorders due to substance-use. Compulsive gambling is characterised by a pattern of persistent or recurrent gambling behaviour, which may be online or offline, manifested by:

- Impaired control over gambling (e.g., onset, frequency, intensity, duration, termination, context)
- Increasing priority given to gambling to the extent that gambling takes precedence over other life interests and daily activities, and
- Continuation or escalation of gambling despite the occurrence of negative consequences (e.g., recurrent conflicts in relationships, recurrent and sizeable financial losses, occupational or education consequences and health consequences).

Problematic gambling behaviour may develop over several years or over a short period of time. Compulsive gamblers often gamble with multiple licence holders, and in some cases the player may already suffer from a gambling addiction established at another online operator or a land-based operator when setting up an account with an online gambling operator. Consequently, identification of problematic gambling behaviour should not be based solely on markers of escalating gambling. There can be many reasons for developing a gambling addiction. Research indicates that biological, psychological, and social factors influence this. Similarly, research indicates that gambling problems can be episodic and breaks from gambling or decreased gambling activity may thus be part of the symptom picture.

It is often seen that people with problematic gambling behaviours are attracted by games with a short time between stake and win, that is, games that are decided quickly after the stake is made.

“The prevalence study of gambling and gambling problems in Denmark 2021” made the following main

conclusions:

- It is estimated that around 478,000, corresponding to 10.9 percent of adult Danes have as a minimum a low level of gambling problems.
- It is estimated that around 29,500, corresponding to 0.67 percent of adult Danes have a serious gambling problem.
- Adults with gambling problems are predominantly men in the age groups 18-24 years old and 25-39 years old with a low level of education.
- Adults with gambling problems experience having a poorer physical health, a higher use of alcohol and drugs, and a higher self-reported crime incidence.
- Adults with gambling problems often have online betting or land-based betting as their onsetting game, while adults without gambling problems often have scratch cards as their onsetting game.
- Adults with gambling problems prefer online casino or online betting.

[The prevalence study in its entirety is available on the DGA's website.](#)

2.2.2 Young people and problematic gambling

Young people form a particularly vulnerable group in relation to gambling, which is also emphasised in the legislative intent of the Danish Act on Gambling.

“The prevalence study of gambling and gambling problems in Denmark 2021” made the following main conclusions concerning children and young people aged 12-17:

- It is estimated that around 24,500 children and young people, corresponding to about 6 percent of the age group have had as a minimum a low level of gambling problems within the last year.
- It is estimated that around 2,600 children and young people, corresponding to about 0.6 percent of the age group have serious gambling problems.
- Children and young people with gambling problems are to a greater extent boys.
- Children and young people with gambling problems often have online betting as their onsetting game. The preferred type of gambling among children and young people with gambling problems are online betting and online casino.

Since young people form a particularly vulnerable group, and since there are indications that an early gambling debut increases the risk of developing a problematic gambling behaviour later in life, licence holders should have a particular focus on preventing young people under 18 from gambling. This requires licence holders to pay special attention to the age of the players and have procedures that effectively ensure that young people under 18 cannot play. For example, licence holders that offer land-based betting, gambling arcades and venues where that are gaming machines must pay particular attention to checking the identification of young people who play. Similarly, land-based casinos must make sure that a player does not make use of another person's ID.

The fact that many young people have gambled online and the many have used another person's debit card to gamble, requires that licence holders that offer online casinos and online betting have efficient procedures to ensure that young people under 18 cannot play. In this connection, licence holders should be aware that young people under 18 can have provided another person's civil registration number or have used another person's NemID upon login, and licence holders should take this into account in the responsible gambling procedures. The licence holders should also have clear procedures for how to respond if it is discovered that a person under the age of 18 has played.

It is not allowed to let young people under 18 participate in gambling activities. A violation of this is

considered grossly negligent and can be sanctioned with a fine or a prison sentence pursuant to section 59(1) of the Gambling Act.

Charity lotteries are exempted from this rule, as there is no age limit for participation. For the regular lottery games (the monopoly), the age limit for participation is 16.

2.3 Measures to ensure responsible gambling

2.3.1 ROFUS

Register of self-excluded players (ROFUS), is a register of all players in Denmark who voluntarily have excluded themselves from gambling temporarily or permanently. If one is registered with ROFUS, one is excluded from gambling at online casinos and on online betting with gambling operators with a Danish gambling licence, and one cannot access land-based casinos in Denmark.

ROFUS does not cover other gambling sectors, and therefore a player can still play other types of games even if the person in question is registered with ROFUS.

ROFUS is operated and maintained by the Danish Gambling Authority.

ROFUS works by voluntary registration. A player registers with ROFUS on ROFUS.nu if the player wishes to self-exclude from gambling temporarily or permanently.

Upon registration, the player has three options:

Gambling break – an exclusion period of 24 hours.

Temporary exclusion – an exclusion period of 1, 3, or 6 months.

Permanent exclusion – permanent exclusion unless the player requests the Danish Gambling Authority to have the exclusion removed. Removal of the exclusion is not possible before 1 year and 7 days after the time of registration.

ROFUS contains information about civil registration number on the players in the register, the date and time of exclusion and end date of a temporary exclusion.

Temporary exclusions are automatically removed when the exclusion period has expired. The exclusion is automatically removed at the exact date and time when the temporary exclusion expires. It is not possible to have a temporary exclusion removed before time and it is not possible to undo a registration.

A player who has signed up for permanent exclusion may, at the earliest of one year after the date of registration, request the Danish Gambling Authority to have the exclusion removed. This means that it is not possible to undo a permanent exclusion until a year, as a minimum, has passed. The player must confirm the request 7 days after the request is made to complete the removal of the exclusion. If the player has not confirmed the request to have the exclusion removed within 30 days, the request will be nullified.

A licence holder cannot register a player with ROFUS on behalf of the player, but the licence holder must inform the player of the opportunity to register with ROFUS. A licence holder that provides online casinos and online

betting must also provide access to registration on all platforms where games are provided. Similarly, a land-based casino must provide access to registration on its website. This may be done by linking directly to the register from the website.

Upon creation of a new account, the licence holder must consult the register to ensure that the player is not registered with ROFUS. If a player is registered with ROFUS, the creation of the account must be rejected by the licence holder.

Each time a player logs on to his or her account with a licence holder that offers online casino or online betting, the licence holder must consult ROFUS and verify that the player is not registered with ROFUS. If a player is registered with ROFUS, the player must be denied access to play. In case of permanent exclusion, the customer relationship must be terminated when the player attempts to log into the account or when the licence holder by other means become aware of the player's permanent registration with ROFUS. In case of temporary exclusion, the customer relationship must not be terminated, but the player must be denied access to play as long as the exclusion period lasts.

Each time a guest request access to a land-based casino, the casino must consult ROFUS and verify that the guest is not registered with ROFUS. If the guest is registered with ROFUS, the guest must be denied entrance to the casino. Thus, it is not sufficient that the guest is simply denied access to play.

A player registered in ROFUS on or after 1 January 2020 automatically refuses to receive marketing materials from licence holders during the exclusion period. No later than 24 hours before a licence holder releases marketing materials, the licence holder must consult the register to verify if a player is registered with ROFUS.

By marketing is meant any type of commercial contact, which the licence holder aims at a citizen.

Push-messages and notifications can be considered marketing covered by the duty to consult ROFUS prior to sending. The assessment of whether a message or notification is considered marketing depends on the textual content and the selection of the recipient, among other things.

In addition to ROFUS, it must also be possible to self-exclude from gambling directly with the individual licence holder regardless of whether the licence holder provides online gambling or land-based casino. Find more information about this in chapter 3.

Rules on self-exclusion with ROFUS is available in:

- Executive Order on online casino section 24
- Executive Order on online betting section 18
- Executive Order on land-based casinos section 10

2.3.1.1 Special information about former ROFUS registrations

As a rule, a licence holder should not save data on a citizen's status with ROFUS for later use.

ROFUS is a service for citizens who want to block their option of creating a gambling account, log into an existing account and receive direct marketing from operators of online casino, online betting and land-based casinos.

It is critical that citizens find that personal data in ROFUS is processed confidentially to avoid that the credibility of the system is damaged. The Danish Gambling Authority find that many citizens are worried about subsequent consequences of a registration with ROFUS after its expiration.

If a licence holder uses information about a player's former registration with ROFUS to discriminate the player, there is a risk of deterring the player from using ROFUS at a later time although the player may need it.

Thus, the Danish Gambling Authority does not allow the use of data on a citizen's former registration with ROFUS by assigning a risk score in relation to responsible gambling.

This means that a licence holder only has the right to save and use data on players' statuses with ROFUS in the two following situations:

- In relation to sending marketing material to existing customers where it is directly stated in the individual executive orders that ROFUS can be consulted in up to 24 hours before the sending of the marketing material. In this situation, licence holders can save and use data from ROFUS that is up to 24 hours old.
- Additionally, it is allowed to save a log of completed ROFUS calls to document that the licence holder has complied with its obligations. The log cannot be used for other purposes.

2.3.2 StopSpillet (StopGambling)

On 2 January 2019, the Danish Gambling Authority launched the national helpline "StopSpillet".

StopSpillet is the Danish Gambling Authority's helpline about compulsive gambling and responsible gambling. StopSpillet is for anyone who wants advice on problematic gambling and counselling about compulsive gambling. The counselling is performed by professional and specially trained advisers.

All conversations with StopSpillet are confidential, and the Danish Gambling Authority do not disclose information from the conversations to others.

Anyone who wants to talk about problematic or compulsive gambling can call. It may be people who have gambling problems themselves or relatives of someone with a gambling problem. Professionals who have questions about compulsive gambling are also welcome to call.

StopSpillet also operates a live chat where one can chat with an adviser. The chat is available on [StopSpillet.dk](https://stopspillet.dk).

StopSpillet can be contacted on telephone number + 45 70 22 28 25.

3 Legal basis

3.1 The Danish Act on Gambling

As described in section 2.1, section 1 of the Danish Act on Gambling is a legislative intent which emphasises that the purpose of the gambling legislation is that gambling is provided and conducted responsibly, among other things.

Pursuant to the Danish Act on Gambling, a number of executive orders have been issued that apply to the various gambling sectors. The executive orders contain detailed rules on responsible gambling. The individual executive orders/gambling sectors are reviewed individually below.

It should be noted that, in addition to the rules of the Danish Act on Gambling and the executive orders, a number of terms and conditions that the various licence holders must comply with are also stipulated. These terms and conditions are set out in the individual licence holders' licences.

3.2 Executive orders

3.2.1 Executive orders on online casino and online betting

The rules on online casino and online betting are laid down in two different executive orders. However, the majority of the rules on responsible gambling are the same for the two gambling sectors. Accordingly, the rules are reviewed collectively below.

It should be noted that some of the rules apply only to online casinos. In this case, it is clearly stated.

3.2.1.1 Information for the player

3.2.1.1.1 *Information on the website*

It follows from the Executive Order on online betting section 13(1) and Executive Order on online casino section 15(1) that:

Section 13/section 15. The licence holder's website or user interface must:

- 1) state that it is not allowed for persons under the age of 18 to participate in the games,
- 2) inform about responsible gambling and the potential harmful effects of gambling and the information must be prepared in collaboration with a treatment centre for compulsive gambling,
- 3) provide access to a self-assessment test for compulsive gambling,
- 4) provide information about and contact addresses of Danish treatment centres for compulsive gambling,
- 5) refer to the Danish Gambling Authority's helpline about responsible gambling, and
- 6) inform about the opportunity to register with the register of self-excluded players.

Paragraph 2. The information in paragraph 1 must be placed prominently on the licence holder's website or user interface, and the information must be accessible from all pages on the website.

Prominent place

User interface means any media on which the licence holder provides gambling. In addition to a website, this may, for example, be an app.

The requirement that the information must be prominently placed in the licence holder's website or user interface entails that the information is made easily accessible for the player. For example, licence holders can compile all information under a meaningful heading such as "Information about responsible gambling", "gamble responsibly" or a similar heading.

The requirement that the information must be accessible from all pages of the website entails that the information is no more than one click away from all pages of the website. This means that it must not be possible to find a page or a game where multiple clicks are needed to find the information.

Age limit

The age limit for participation in a game must appear from the licence holder's website or user interface. It is considered sufficient if the licence holder uses the term "18+".

Responsible gambling and the potential gambling-related harms

The requirement that information about responsible gambling and the potential gambling-related harms must be prepared in cooperation with a treatment centre for compulsive gambling means that the information must be of a sufficiently high quality. It is not required that the information must be prepared by one of the Danish state-funded treatment centres as long as the information is on an equally high and professional level.

Self-test

There are a number of different self-assessment tests available about compulsive gambling, including those based on a number of questions, which the player must answer, as well as self-assessment tests based on gambling behaviour. It is up to the licence holder to choose which type of self-assessment test they provide access to, if the self-assessment test is qualified and can, reliably, indicate if there is a gambling problem. It is also required that the test is in Danish.

A self-test is available on StopSpillet's website, which licence holders are welcome to use. Thereby, licence holders can comply with the requirement for referring to a self-test by linking directly to StopSpillet's self-test. [StopSpillet's self-test is available on StopSpillet.dk.](#)

Treatment centres

The requirement that information about and contact addresses on Danish treatment centres for compulsive gambling must be provided means that referring to a single treatment centre will not suffice. The Danish Gambling Authority consider it most appropriate to refer to all state funded treatment centres. An updated list is available at [StopSpillet.dk.](#)

StopSpillet

Reference to the Danish Gambling Authority's helpline for compulsive gambling and responsible gambling StopSpillet must be made in a manner that makes it easy for the player to find it. This may be done by linking directly to StopSpillet's website and by providing the telephone number of StopSpillet. The reference to StopSpillet must be given in such a way that the player becomes aware of what is referred to, for example "Spillemyndighedens rådgivningslinje om spilafhængighed StopSpillet"/the Danish Gambling Authority's

helpline about responsible gambling StopSpillet” or “Hjælpe linje: StopSpillet / Helpline: StopSpillet”.

ROFUS

Similarly, licence holders must inform players about the option of registering with the register of self-excluded players, ROFUS in such a way that leaves no doubt about what ROFUS is.

It may for example be the following textual description of the self-exclusion option via ROFUS:

- Selvudelukkelse: ROFUS (self-exclusion: ROFUS)
- Udeluk dig via ROFUS (Self-exclude via ROFUS)

It must appear clearly that it is a self-exclusion option, which is why the text “ROFUS” is not enough in itself.

In addition, it means that the use of ROFUS's logo is not sufficient in itself. However, the logo can be used in combination with a descriptive text.

Additional requirements

As stated in section 3.2.1.1.1, the information must be prominently placed on the licence holder's website or user interface and must be accessible from all pages of the website.

Licence holders must also provide access to the Danish Gambling Authority's website. This appears from paragraph 4. It is not required that this access is available from all pages on the website.

Licence to offer gambling products in Greenland

If the licence holder is licenced to operate in Greenland, the information must be provided in both Danish and Greenlandic, and contact addresses for Greenlandic treatment centres must be provided. This appears from paragraph 5.

3.2.1.1.2 Information on the home page of the website

On the home page of the licence holder's website or user interface, it must be stated that the licence holder holds a licence from and is supervised by the Danish Gambling Authority. This appears from paragraph 4. This requirement is considered fulfilled when the Danish Gambling Authority's label is used. For more information, please see section 3.2.1.2.

3.2.1.1.3 Special requirement for online casinos: Clock on website

It follows from the Executive Order on online casino section 17 that:

Section 17. A clock must be provided on the licence holder's website indicating the player's time consumption per log on session on the gambling site. The clock must be easily visible to the player at all times.

Please note that this rule only applies to online casinos.

The player must be able to view the time spent on gambling. The clock must be placed on the licence holder's website or app. It is thus not sufficient that the player has a watch on his or her own computer or telephone. The clock must be visible to the player at all times and must not be based on the player's equipment.

The requirement that the clock must be visible to the player at all times entails that the clock is actually visible to the player throughout the log on session. This means that it must not be possible to remove the clock or scroll away from it.

The clock must not necessarily be a traditional clock or a specific time zone. It may instead be a timer that starts when the players log in.

3.2.1.2 Labelling scheme

It follows from the Executive Order on online betting section 14 and the Executive Order on online casino section 16 that:

Section 14/section 16: The licence holder must use the Danish Gambling Authority's label on its website or user interface.

Subsection 2 The Danish Gambling Authority's label must be placed on the home page of the licence holder's website. On the additional pages of the website, the label must be easily visible to the player.

Subsection 3 The licence holder must at all times use the most recently issued version of the label that is provided by the Danish Gambling Authority. The licence holder must not change the design, proportions or colours of the label.

Subsection 4 The label must not be used in a way that gives the impression that the Danish Gambling Authority is a co-organiser or sponsor.

Subsection 5 The label must not be used by the licence holder's businesspartners or other parties that do not have a licence from the Danish Gambling Authority.

As previously stated, the user interface means any media on which the licence holder provides gambling. In addition to a website, it may, for example, be an app.

The requirement for using of the Danish Gambling Authority's labelling scheme means that the Danish Gambling Authority's label must be visible on home/front page of the licence holder's website or user interface. The label must be easily visible on all pages of the website.

The main purpose of the labelling scheme is to create a safe gambling market and help the player to understand which gambling operators are licenced to provide gambling in Denmark.

To comply with the purpose, the label must be used in such a size that the text on the label "Tilladelse fra Spillemyndigheden / Licence from the Danish Gambling Authority" is readable so that players who are not familiar with the label can tell that the gambling operator is licensed by the Danish Gambling Authority.

It will always be based on an assessment of each case whether the criterion for readability is complied with. In the assessment, it will be considered what is possible taking into account the website's or user interface's technical structure and limitations of space.

The criterion for readability only includes that the label is placed clearly visibly in at least one place on the website in a size where the text on the label is readable. It is therefore in accordance with the labelling scheme to have one or more supplementary versions of the label in smaller sizes in, for example, the top of the website, although the texts on all the labels are not readable.

The Danish Gambling Authority's label shows that the gambling operator holds a licence from the Danish

Gambling Authority and that the Danish Gambling Authority supervises the licence holder.

The most recent version of the label can be downloaded from spillemyndigheden.dk. The label must be used exactly as it is and must not be changed in any way. This means that the label cannot be used in e.g., black and white or in toned down colours.

Exclusively licence holders with a licence to provide gambling can use the Danish Gambling Authority's label on their websites, in their marketing materials etc. Gambling providers that use the label without a licence can incur responsibility according to the Danish Marketing Practices Act.

For more information about the Danish Gambling Authority's labelling scheme, please see [Guidelines for using the Danish Gambling Authority's label](#).

3.2.1.3 Responsible gambling

3.2.1.3.1 *Deposit limit*

It follows from the Executive Order on online betting section 15 and the Executive Order on online casino section 21 that:

Section 15/section 21: A player must set a deposit limit before gambling can begin. The player must be able to choose among a daily, weekly, or monthly deposit limit. The amount of the deposit limit, except for a maximum deposit limit, must not be predetermined by the licence holder.

Subsection 2 A player's request to raise a previously set deposit limit must take effect no earlier than after 24 hours.

By "deposit limit" is meant a limit for the total amount that a player can deposit from an external source to his account. Stake limits for the games themselves are thereby not regulated by the stipulation, but the licence holder may choose to have rules on maximum stakes made in the games.

It is important that the player sets a deposit limit before gambling can begin. Therefore, setting a deposit limit must be a compulsory part of the creation of an account.

For existing customers who have not set a deposit limit, the licence holder must also ensure that the player sets a deposit limit before the player can continue gambling.

The play must, as a minimum, set one of the following deposit limits:

1. A limit for the total daily amount deposited on the account
2. A limit for the total weekly amount deposited on the account, or
3. A limit for the total monthly amount deposited on the account.

By weekly is meant Monday to Sunday. By monthly is meant from the first day of a month to the last day of a month.

It is important that the player actively decides the amount of his deposit limit. Thus, a standard amount cannot be suggested to the player, which is selected if the player does not decide himself.

Licences holders should consider whether the way players must set their deposit limits encourages players to set much higher deposit limits as opposed to realistic and low limits.

The deposit limit must be effective and cannot be illusory. Therefore, it must not be possible to select a very high deposit limit or a deposit limit of more than what the gambling system maximally allows to be deposited into the account.

Examples have shown that it has been possible for players to set deposit limits of several hundred thousand Danish kroner and where no assessment was made as to whether the deposit limit was realistic. In such cases, the deposit limit cannot be considered a real limit since the deposit limit is such an illusory, large amount that it does not have the intended, protective and preventive effect.

Withdrawals of winnings from the account cannot be set off against the deposit limit. This means that the deposit limit actively selected by the player will apply no matter how many withdrawals are made from the account.

It is allowed to offer players additional limitations, for example, a loss limit or similar limits, as long as the deposit limit is the general rule and as long as it is clearly stated what the limits entail. Read more about this in chapter 5.

'That a player's request to raise a previously set deposit limit must take effect no earlier than after 24 hours' is to ensure that the deposit limit is in fact effective, and that the player cannot raise the limit regularly. Conversely, a reduction of the deposit limit should take effect immediately.

For more information, please see [the Danish Gambling Authority's certification programme Inspection Standards for Online Casino SCP.02.03.EN.1.2.](#) / [The Danish Gambling Authority's certification programme Inspection Standards for Online Betting SCP.02.01.EN.1.3.](#)

3.2.1.3.2 Gambling patterns and preventive measures (duty to pay attention)

It appears from the Executive Order on online betting section 16(1) and Executive Order on online casino section 22(1) that:

Section 16/section 22: The licence holder must be familiar with the player's gambling patterns and must take measures to prevent the player from developing a problematic gambling behaviour and a gambling addiction.

The licence holder may become familiar with the players gambling patterns by, for example, using software or by ongoing manual reviews of player history etc. A combination of several different methods can also be applied. What matters is that the procedure ensures that the licence holder actually becomes familiar with the player's gambling patterns. The method chosen must at the same time ensure that the licence holder identifies the players whose gambling patterns indicate problematic gambling behaviours, as well as the players with actual gambling addictions. For more information, please see chapter 4.

In addition, the licence holder must actively use the information coming from analyses of gambling pattern to take measures to prevent the development of problematic gambling behaviour or compulsive gambling. For more information, please see chapter 5.

3.2.1.3.3 *Internal rules and procedures*

It follows from the Executive Order on online betting section 16(2) and (3) and the Executive Order on online casino section 22(2) and (3) that:

Subsection 2 The licence holder must have written internal rules and procedures on responsible gambling to prevent problem gambling and compulsive gambling, including control and communication procedures with players who exhibit problematic gambling behaviour, duty of attention and obligation to register, record keeping of information about the player's gambling behaviour and risk assessment of the player.

Subsection 3 The licence holder must keep records of the player's gambling behavior and the risk assessment of the player for 5 years.

The licence holder's written internal rules and procedures on responsible gambling must include information about how the licence holder identifies problem gamblers and compulsive gamblers. The information must be adjusted to the licence holder's products and customer segment. The internal rules and procedures must describe clear guidelines and procedures for how the licence holder prevents problem gambling and compulsive gambling, including information on general, preventive measures, and how the licence holder's employees must act, when players with problematic gambling behaviours are identified. The procedures must, for example, contain clear information for the employees about which interventions to implement and when.

Similarly, the procedures must include a clear description of the tasks that the individual employee (function) has in connection with the licence holder's total procedure for compliance with the duty of attention and information stating that it must be registered if the player exhibits problematic gambling behaviour. They must also include instructions on how to perform a risk assessment of the player and which actions and measures are set in motion by the various risk assessments. In this connection, the licence holder must have a clear description of how a risk assessment of a player is performed in relation to responsible gambling, including a clear description of factors that contribute to a downgrade of the risk assessment. It is necessary to have several different player categories for an actual risk assessment to be performed. The player categories may, for example, be based on the definitions in section 2.2, (at-risk gambler, problem gambler, compulsive gambler, and other players), but other types of categorisations may also be used which may include more or fewer types of players. What matters is that the categorisation applied takes into account the individual player's situation. For more information, please see chapters 4 and 5.

The licence holder must keep the information about the player's gambling behaviour and risk assessment for 5 years.

It is up to the licence holder to decide whether the internal rules and procedures are described in a single document or in several.

3.2.1.3.4 *Training of employees*

It follows from the Executive Order on online betting section 16(4) and (5) and the Executive Order on online casino section 22(4) and (5) that:

Subsection 4 The licence holder must have training and instructional programmes for relevant employees

to prevent problem gambling and compulsive gambling.

Subsection 5 The licence holder must ensure that the employees involved in customer contact or analysis of players' gambling behaviour is made aware of and apply the internal rules cf. subsection 2.

The requirement for training and instructional programmes for relevant employees' means that it is not necessary for the licence holder to teach all employees how to prevent problem gambling and compulsive gambling. Thus, if an employee's tasks have no relation to players and gambling behaviour, it will not be necessary to train and instruct this employee.

However, it is required that all employees who have contact with players or in any way deal with analysis of players' gambling behaviour are familiar with and apply the internal rules and procedures for responsible gambling. Consequently, it is required that, for example, all employees in customer service are instructed in and apply the internal rules and procedures for responsible gambling. In this connection, the licence holder may choose to differentiate the training and instruction between the employees according to the function and degree of contact with the players the individual employees have.

3.2.1.3.5 Self-exclusion

It follows from the Executive Order on online betting section 17(1) and Executive Order on online casino section 23(1) that:

Section 17/section 23: The licence holder must make available to the player a service that enables the player to request temporary or permanent exclusion from the licence holders gambling offers. The licence holder must ensure that the player cannot make use of the gambling offers after the player has requested exclusion.

The self-exclusion service must work in a way that ensures that the self-exclusion takes immediate effect, ensuring that the player cannot continue playing after the request of self-exclusion has been made. A service where the player must contact the licence holder, for example by email, will not suffice, as the self-exclusion period will not take immediate effect after the request has been made and the player is able to continue gambling until the request is processed.

The player must be able to self-exclude:

Short-term – with an exclusion period of 24 hours (cooling-off period).

Temporarily – with an exclusion period of 30 days as a minimum.

Permanently – with an exclusion that closes the customer's account and terminates the customer relationship.

In case of a temporary and short-term exclusion, the player's account must be deactivated during the self-exclusion period. The account may be reactivated when the self-exclusion period expires.

Since the short-term exclusion period is defined as 24 hours, it must not be possible to self-exclude for less than 24 hours. Similarly, it must not be possible to self-exclude for a time period between 24 hours and 30 days, as the temporary exclusion period must be a minimum of 30 days. It would for example be against the Executive Order if a temporary exclusion of 7 days were offered. In contrast, the player may be offered a temporary exclusion period that lasts more than 30 days. It is also allowed to offer various tools that can help the player in planning

their gambling, for example, that gambling is only possible for a certain number of hours a day, or that gambling is only possible on certain times of the day.

The rules on the length of the self-exclusion periods are stipulated with a view to preventing players from self-excluding for periods that are too short to break a (potentially) negative gambling pattern.

In case of permanent exclusion, the account, as mentioned above, must be closed and the customer relationship terminated. No earlier than 1 year after the closing of the account may the player be registered as a new customer again. The licence holder must therefore store the information about a player's self-exclusion, so that the customer cannot register as a new customer after a short time. The registration of the player's exclusion should be done via the customer's civil registration number or similar to ensure that the customer cannot create a new account, for example by entering a different e-mail address than the previously registered e-mail address. The exclusion covers all games per domain.

A licence holder may establish its own rules that require that more than 1 year should pass before a permanently self-excluded player can create account again.

A licence holder must inform a player who has self-excluded from the licence holder's gambling services about counselling and treatment offers for compulsive gamblers at a Danish treatment centre. If the player is a customer from Greenland, the licence holder must inform the player about counselling and treatment offers for compulsive gambling at a Greenlandic treatment centre. The information must be provided to the player whether the player has opted for short-term, temporary or permanent self-exclusion.

3.2.2 Special requirements regarding online bingo via television

It appears from section 18 of the Executive Order on online casino that:

Section 18: Licence holders who offer online bingo via television and who do not have a website must provide the player with the information stated in sections 14(1)(1) and 15(1) and (3) in another way. Subsection 2. In connection with the broadcast, the licence holder must inform the player about the age requirement, cf. section 15(1)(1) and about the licence and supervision cf. section 15(3) and where additional information as stated in sections 14 and 15 is available. Subsection 3. Section 17 does not apply to online bingo offered via television.

This means that the information that licence holders offering online bingo via television and who do not have a website must provide in another way to the player is:

1. That it is not allowed for persons under 18 to participate in the games,
2. Information about responsible gambling and the potential gambling-related harms and this information must be prepared in cooperation with a treatment centre for compulsive gambling,
3. Access to a self-test about compulsive gambling,
4. Information about and contact addresses on Danish treatment centres for compulsive gambling,
5. Reference to the Danish Gambling Authority's helpline about responsible gambling,
6. Information about the option to register with the register of self-excluded players (ROFUS),
7. That the licence holder is licensed and supervised by the Danish Gambling Authority.

The information must be available in Danish.

The reference to StopSpillet must be given in such a way that the player becomes aware of what is referred

to, for example “Spillemyndighedens rådgivningslinje om spilafhængighed StopSpillet”/the Danish Gambling Authority's helpline about responsible gambling StopSpillet” or “Hjælpe linje: StopSpillet / Helpline: StopSpillet”.

During the broadcast, the licence holders must provide the following information:

1. The age requirement of 18 years old
2. That the licence holder is licensed and supervised by the Danish Gambling Authority,
3. Where the licence holder provides the additional information.

The requirement for a watch stating the player's time spent does not apply to online bingo via television.

A more detailed review of the requirements for information is available in section 3.2.1 on online casino and online betting.

3.2.3 Executive Order on land-based betting

3.2.3.1 Information for the player

It follows from the Executive Order on land-based betting section 3(1) that:

Section 3. At the point of sale, it must:

- 1) state that it is not allowed for persons under the age of 18 to participate in the games,
- 2) inform about responsible gambling and the potential harmful effects of gambling and the information must be prepared in cooperation with a treatment centre for compulsive gambling,
- 3) provide information about and contact addresses of Danish treatment centres for compulsive gambling, and
- 4) state that the licence holder has a licence from and is supervised by the Danish Gambling Authority.

By “the point of sale” is meant any counter or self-service terminal from where it is possible to buy gambling products.

The information must take up a prominent place at the point of sale and the player must be presented with the information before participation in the game. The licence holder must ensure that the information in fact does take up a prominent place. If it is chosen that the information should appear on the counter at the point of sale, it must be ensured that the information is not covered with good or other things.

The information may also appear from posters or TV screens. If TV screens are used, it is at all times the licence holder's responsibility to ensure that the screen is operating. If TV screens are used, it must be ensured that there is no switching between the information in very long “rolls” which means that you have to wait a long time to see the information.

The requirement that the player must be presented with the information before participating in the game means that it will not suffice to provide the information together with, for example, the coupon.

As a supplement, the point of sale can provide some of the information in a format to be handed out or taken with by the players. This could be a flyer with information about responsible gambling and the potential harmful effects of gambling and contact information on Danish treatment centres.

A licence holder with a licence to provide gambling in Greenland must provide the information in both Danish

and Greenlandic, and contact addresses on Greenlandic treatment centres must be provided.

The requirement that people under the age of 18 are not allowed to participate in the games make demands on the licence holder to instruct the employees at the point of sale in checking the identification of young people who wish to gamble, to effectively ensure that young people under the age of 18 do not have access to gambling activities.

The requirement that information about and contact addresses on Danish treatment centres for compulsive gambling must be provided means that referring to a single treatment centre will not suffice. The Danish Gambling Authority consider it most appropriate to refer to all state funded treatment centres. Alternatively, there may be referred to the treatment centres nearest the point of sale. An updated list of state funded treatment centres is available at StopSpillet.dk.

3.2.3.2 Labelling scheme

It follows from the Executive Order on land-based betting section 4 that:

Section 4. The Danish Gambling Authority's labelling scheme must be used at the point of sale. The label must be easily visible to the player.

Subsection 2 The licence holder must at all times use the most recently issued version of the label that is provided by the Danish Gambling Authority. The licence holder must not change the design, proportions or colours of the label.

Subsection 3 The label must not be used in a way that gives the impression that the Danish Gambling Authority is a co-organiser or sponsor.

Subsection 4 The label must not be used by the licence holder's businesspartners or other parties that do not have a licence from the Danish Gambling Authority.

The requirement for using the Danish Gambling Authority's labelling scheme means that the Danish Gambling Authority's label must be visible to the player at the point of sale.

The main purpose of the labelling scheme is to create a safe gambling market and help the player to understand which gambling operators are licenced to provide gambling in Denmark.

To comply with this purpose, the label must be used in such a size that the text on the label "Tilladelse fra Spillemyndigheden / Licence from the Danish Gambling Authority" is readable so that players who are not familiar with the label can see that the gambling operator is licensed by the Danish Gambling Authority.

The Danish Gambling Authority's label shows that the gambling operator holds a licence from the Danish Gambling Authority and that the Danish Gambling Authority supervises the licence holder.

The most recent version of the label can be downloaded from spillemyndigheden.dk. The label must be used exactly as it is and must not be changed in any way. This means that the label cannot be used in e.g., black and white or in toned down colours.

Exclusively licence holders with a licence to provide gambling can use the Danish Gambling Authority's label on their websites, in their marketing materials etc. Gambling providers that use the label without a licence can incur responsibility according to the Danish Marketing Practices Act.

For more information about the Danish Gambling Authority's labelling scheme, please see [Guidelines for using the Danish Gambling Authority's label](#).

3.2.4 Executive Order on land-based casinos

3.2.4.1 Information for the player

3.2.4.1.1 *Information at the entrance to the casino*

It follows from the Executive Order on land-based casinos section 12(1) that:

Section 12. The casino must in a prominent place at the entrance area in writing:

- 1) state that it is not allowed for people under the age of 18 to have access to the casino,
- 2) provide information about responsible gambling and the potentially harmful effects of gambling,
- 3) provide contact addresses on Danish treatment centres for compulsive gambling,
- 4) inform about the casino's house rules, which means the rules for accessing and staying at the casino,
- 5) state that tipping employees at the casino is voluntary,
- 6) inform about the opportunity and consequences of self-excluding from gambling at the casino,
- 7) inform about the opportunity to register with the register of self-excluded players,
- 8) inform about the Danish Gambling Authority's helpline about responsible gambling, and
- 9) inform about the casino's processing of complaints, including where people may direct a complaint.

The information must be provided in both Danish and English.

Prominent place

The requirement that the information must be provided at a prominent place at the entrance area is to ensure that the visitor is presented with the information before entering the casino. The information may also appear from posters or TV screens. If TV screens are used, it is at all times the licence holder's responsibility to ensure that the screen is operating. If TV screens are used, it must be ensured that there is no switching between the information in very long "rolls" which means that you have to wait a long time to see the information.

The licence holder must ensure that the information is in fact given a prominent place at the entrance area and is clearly visible. This requires that the information is presented in a certain size and is placed prominently enough to make guests notice the information when they enter the casino.

As a supplement to placing the information prominently at the entrance, the casino can have the information in a portable form for handing out or for guests to take home. For example, flyers, including contact addresses on Danish treatment centres, the phone number for StopSpillet, guidance on the option to self-exclude with ROFUS or similar information.

Age limit

The requirement that people under the age of 18 are not allowed to enter the casino requires that employees at the entrance area be careful to check the identity of the visitors. The extent of identification must always be determined based on a risk assessment. What matters is that the casino is certain that the guest is the person they are claiming to be. In this connection, the employees must pay special attention to the use of self-service scanners to ensure that people under the age of 18 or people registered with ROFUS do not have access to the casino even though self-service scanners are used. Regardless of the type of admittance control used, the licence holder is at all times responsible for ensuring that due registration and verification of the guest's identity is performed.

Responsible gambling and potential gambling-related harms

The information about responsible gambling and the potentially harmful effects of gambling must be prepared in collaboration with a treatment centre for compulsive gambling. The requirement that information about responsible gambling and the potential gambling-related harms must be prepared in cooperation with a treatment centre for compulsive gambling means that the information must be of a sufficiently high quality. It is not required that the information must be prepared by one of the Danish state-funded treatment centres as long as the information is on an equally high and professional level.

Treatment centres

The requirement that information about and contact addresses on Danish treatment centres for compulsive gambling must be provided means that referring to a single treatment centre will not suffice. The Danish Gambling Authority consider it most appropriate to refer to all state funded treatment centres. Alternatively, there may, for example, be referred to the treatment centres nearest the casino.

An updated list of state funded treatment centres is available at StopSpillet.dk.

ROFUS

The information about the option to register with the register of self-excluded players, ROFUS, must be given in a way that leaves no doubt about what ROFUS is.

It may for example be the following textual description of the self-exclusion option via ROFUS:

- Selvudelukkelse: ROFUS (self-exclusion: ROFUS)
- Udeluk dig via ROFUS (Self-exclude via ROFUS)

It must appear clearly that it is a self-exclusion option, which is why the text "ROFUS" is not enough in itself.

In addition, it means that the use of ROFUS's logo is not sufficient in itself. However, the logo can be used in combination with a descriptive text.

StopSpillet

Reference to the Danish Gambling Authority's helpline about responsible gambling and compulsive gambling, StopSpillet, must be done in a manner that makes it easy for the player to find it. This maybe done, for example, by providing the telephone number of StopSpillet. The reference to StopSpillet must be given in such a way that the player becomes aware of what is referred to, for example "Spillemyndighedens rådgivningslinje om spilafhængighed StopSpillet / the Danish Gambling Authority's helpline about responsible gambling StopSpillet" or "Hjælpe linje: StopSpillet / Helpline: StopSpillet".

3.2.4.1.2 Information on the casino's website

It follows from the Executive Order on land-based casinos section 14(1) that:

Section 14. The following must be stated on the casino's website:

- 1) That people under the age of 18 are not allowed entrance to the casino.
- 2) That the casino is licenced and supervised by the Danish Gambling Authority and access to the Danish Gambling Authority's website must be provided.
- 3) Information prepared in collaboration with a treatment centre for compulsive gambling about

responsible gambling and the potentially harmful effects of gambling.

- 4) Information about the opportunity to register with the register of self-excluded players and there must be provided access to registration at the Danish Gambling Authority's website.
- 5) Access to a self-assessment test for compulsive gambling.
- 6) Information about and contact addresses on Danish treatment centres for compulsive gambling.
- 7) Information about the Danish Gambling Authority's helpline about responsible gambling.
- 8) Information about the casino's processing of complaints.

Subsection 2. The information under section 1 must be prominently placed on the website and must be available from all pages of the website.

The information must be provided in both Danish and English.

Prominent place

The requirement for placing the information prominently on the licence holder's website means that it is made easy for the player to find the information. For example, the casino can compile all information under a meaningful heading such as "Information about responsible gambling", "gamble responsibly" or a similar heading.

The requirement that the information must be accessible from all pages of the website entails that the information is no more than one click away from all pages of the website. This means that it must not be possible to find a page or a game where multiple clicks are needed to find the information.

Age limit

The age limit for accessing the casino must appear from the casino's website. The phrasing "18+" can be used if it supplemented with a descriptive text saying that the age limit applies to both participation in games and access to the casino.

Access to the Danish Gambling Authority's website

Access to the Danish Gambling Authority's website can be done by linking directly to the Danish Gambling Authority's website.

Responsible gambling and potential gambling-related harms

The requirement that information about responsible gambling and the potential gambling-related harms must be prepared in cooperation with a treatment centre for compulsive gambling means that the information must be of a sufficiently high quality. It is not required that the information must be prepared by one of the Danish state-funded treatment centres as long as the information is on an equally high and professional level.

ROFUS

Similarly, there may be provided a direct link to the registration page at ROFUS to meet the requirement of providing access to registration in the register. A direct link to the registration form should be provided. The information about ROFUS must also be disclosed in a way that leaves no doubt about what ROFUS is.

It may for example be the following textual description of the self-exclusion option via ROFUS:

- Selvudelukkelse: ROFUS (self-exclusion: ROFUS)
- Udeluk dig via ROFUS (Self-exclude via ROFUS)

It must appear clearly that it is a self-exclusion option, which is why the text "ROFUS" is not enough in itself.

In addition, it means that the use of ROFUS's logo is not sufficient in itself. However, the logo can be used in combination with a descriptive text.

Self-test

There are a number of different self-assessment tests available about compulsive gambling, including those based on a number of questions the player must answer, as well as self-assessment tests based on gambling behaviour. It is up to the licence holder to choose which type of self-assessment test they provide access to, if the self-assessment test is qualified and can, reliably, indicate if there is a gambling problem.

It is also required that the test is in Danish.

A self-test is available on StopSpillet's website, which licence holders are welcome to use. Thereby, licence holders can comply with the requirement for referring to a self-test by linking directly to StopSpillet's self-test. [StopSpillet's self-test is available on StopSpillet.dk.](#)

Treatment centres

The requirement that information about and contact addresses on Danish treatment centres for compulsive gambling must be provided means that referring to a single treatment centre will not suffice. The Danish Gambling Authority consider it most appropriate to refer to all state funded treatment centres. An updated list is available at [StopSpillet.dk](#).

StopSpillet

Information about StopSpillet must be done in a manner that makes it easy for the player to find it. This may be done by linking directly to StopSpillet's website and by providing the telephone number of StopSpillet. The reference to StopSpillet must be given in such a way that the player becomes aware of what is referred to, for example "Spillemyndighedens rådgivningslinje om spilafhængighed StopSpillet / the Danish Gambling Authority's helpline about responsible gambling StopSpillet" or "Hjælpelinje: StopSpillet/ Helpline: StopSpillet".

3.2.4.2 Labelling scheme

It follows from the Executive Order on land-based casinos section 16 that:

Section 16. The casino must use the Danish Gambling Authority's labelling scheme at the entrance area and on its website.

Subsection 2 The Danish Gambling Authority's label must be easily visible to the player at the entrance area and at the entrance to adjacent premises and must be placed in the left or right upper corners of the home page of the casino's website. On the additional pages of the website, the label must be easily visible to the player.

Subsection 3 The casino must at all times use the most recently issued version of the label that is provided by the Danish Gambling Authority. The casino must not change the design, proportions or colours of the label.

Subsection 4 The label must not be used in a way that gives the impression that the Danish Gambling Authority is a co-organiser or sponsor.

Subsection 5 The label must not be used by the casino's business partners or other parties that do not have a licence from the Danish Gambling Authority.

The requirement that the Danish Gambling Authority's labelling scheme must be used means that the Danish Gambling Authority's label must be visible to the player at the casino's entrance area and on the left or right top corners of the home page of the casino's website.

The main purpose of the labelling scheme is to create a safe gambling market and help the player to understand which gambling operators are licenced to provide gambling in Denmark. To comply with the purpose, the label must be used in such a size that the text on the label "Tilladelse fra Spillemyndigheden / Licence from the Danish Gambling Authority" is readable so that players who are not familiar with the label can tell that the gambling operator is licensed by the Danish Gambling Authority.

The Danish Gambling Authority's label shows that the gambling operator holds a licence from the Danish Gambling Authority and that the Danish Gambling Authority supervises the licence holder.

The most recent version of the label can be downloaded from spillemyndigheden.dk. The label must be used exactly as it is and must not be changed in any way. This means that the label cannot be used in e.g., black and white or in toned down colours.

It is exclusively the casino itself which is licenced to provide gambling that can use the Danish Gambling Authority's label at the casino, in its marketing materials etc. This also means that the casino's business partners cannot use the label. Gambling providers that use the label without a licence can incur responsibility according to the Danish Marketing Practices Act.

For more information about the Danish Gambling Authority's labelling scheme, please see [Guidelines for using the Danish Gambling Authority's label](#).

3.2.4.3 Responsible gambling

3.2.4.3.1 *Self-exclusion*

It follows from the Executive Order on land-based casinos section 9 that:

Section 9. The casino must upon request from a person register the identification information mentioned in section 3, including information on the person's self-exclusion from the casino and must be denied access to the casino at the entrance.

Subsection 2. The request under subsection 1, which must be made by the person himself, can be made either in writing or personally at the casino. Before the casino self-exclusion registration, the person must sign and date a statement about the self-exclusion. The casino must make it possible for persons to sign the statement at the entrance to the casino.

Subsection 3. The registration under subsection 1 must take effect as either a temporary or a permanent exclusion according to the request made by the person in question. A temporary exclusion cannot be less than 30 days.

Subsection 4. If a permanent exclusion is chosen, the person can request to have the exclusion removed at any time, however no earlier than 1 year after the registration. The request for removal of the exclusion must be made under the same rules as stated in subsection 2. The information in the register must be automatically deleted five years after the registration even though a request for removal has not been made from the person registered.

Subsection 5. If a person has self-excluded, the casino must inform the person about counselling and treatment options for compulsive gambling at a Danish treatment centre and the option to register with the Danish Gambling Authority's register of self-excluded players (ROFUS) either temporarily or permanently.

Thus, it must be possible to self-exclude from a casino. If a person requests to be excluded, the casino must register that the person has self-excluded from the casino. The information that must be registered about the person is name, address, and civil registration number or similar information if the person does not have a civil registration number.

If a visitor who has self-excluded from the casino attempts to enter the casino, the person must be denied admittance at the entrance to the casino so that the person cannot enter the casino. Access to the casino can, for example, be prevented by ensuring that it is not possible to print a ticket or showing a red warning sign when the person's personal data is entered. Even if the visitor does not intend to gamble at the casino, the casino must not allow the person access, and the casino is obligated to have in place sufficient procedures to ensure that a person who has requested self-exclusion cannot enter the casino. Special measures must be taken if the casino makes use of self-service scanners.

Self-exclusion can only be requested on one's own behalf. However, it must be possible to make the request in writing and by approaching the casino in person. The person in question must sign and date a document stating the wish to self-exclude. It must be possible to sign the statement at the entrance to the casino so the person may avoid entering the casino.

The player must have the opportunity to self-exclude:

Temporarily – with an exclusion period of no less than 30 days.

Permanently – an exclusion that can first be removed 1 year after the exclusion has taken effect at the earliest.

In case of a permanent exclusion, the person may request to have the self-exclusion removed at any time, however no earlier than after the 1-year minimum duration period. It must be possible to request having the exclusion removed in writing and by approaching the casino in person. Due to the obligation to delete data, the self-exclusion registration must be deleted five years after the registration regardless of whether it has been requested that the exclusion be removed. This means that a permanent exclusion from a land-based casino is in fact only effective for 1 to 5 years.

If a person has self-excluded, the casino must inform the person about counselling and treatment offers for compulsive gamblers at a Danish treatment centre and the opportunity to register with the Danish Gambling Authority's register of self-excluded players. The information must be provided to the player whether the player has opted for temporary or permanent self-exclusion. The casino must ensure that all employees who process requests for self-exclusion are sufficiently instructed in how the information must be provided.

Marketing and self-exclusion

It appears from section 17 of the Executive Order on land-based casinos that:

Section 17. The casino must take measures to prevent sending marketing material to persons who have self-excluded from the casino.

The requirement that the casino must take measures to prevent sending marketing material to persons who have self-excluded from the casino means that the casino must make an effort to identify whether the persons who have subscribed to their marketing, newsletters etc. coincide with the persons who have self-excluded from the casino.

In addition to pooling the lists, the casino can also call attention to the rule in section 17, when a person self-excludes from the casino. The casino can also point out the rule to its customers in their direct marketing.

3.3 Executive Order on gaming machines in gambling arcades and restaurants

3.3.1 Information for the player

3.3.1.1 In gambling arcades

It follows from section 17 of the Executive Order on gaming machines in gambling arcades and restaurants that:

Section 17. At the entrance to a gambling arcade the following information must be easily visible to the player:

- 1) that people under the age of 18 are not allowed access to a gambling arcade, and
- 2) a reference to the Danish Gambling Authority's helpline for responsible gambling.

The requirement for the information to be placed at the entrance and be easily visible to the player is to ensure that the player is presented with the information before entering the gambling arcade. The licence holder must ensure that the information has a prominent place and is clearly visible.

The requirement that people under the age of 18 are not allowed access to the gambling arcade means that the staff is particularly careful to verify the identification of young people who wish to enter the arcade to effectively ensure that people under the age of 18 do not have access to participate in gambling activities.

Reference to StopSpillet must be done in a manner that makes it easy for the player to find it. This may be done by providing the telephone number of StopSpillet. The reference to StopSpillet must be given in such a way that the player becomes aware of what is referred to, for example "Spillemyndighedens rådgivningslinje om spilafhængighed StopSpillet / the Danish Gambling Authority's helpline about responsible gambling StopSpillet" or "Hjælpe linje: StopSpillet / Helpline: StopSpillet".

As a supplement, the arcade may conveniently provide some of the information in a form that can be handed out or taken by the players. It may be flyers with information about StopSpillet.

3.3.1.2 In restaurants, cafes and bars with gaming machines

It appears from section 18 of the Executive Order on gaming machines in gambling arcades and restaurants that:

Section 18. Near gaming machines installed in restaurants, cafes and bars, it must be clearly visible to the player:

- 1) that persons under the age of 18 are not allowed to gamble on gaming machines and
- 2) a reference to the Danish Gambling Authority's helpline about responsible gambling.

The information disclosing that persons under the age of 18 cannot gamble on gaming machines and a reference to StopSpillet must be clearly visible to the player from all gaming machines in the restaurant, café or bar.

That people under the age of 18 are not allowed to gamble on gaming machines requires that the staff at restaurants, cafes and bars are particularly careful to verify the identification of young people who gamble on the gaming machines to effectively ensure that people under the age of 18 do not have access to participate in gambling activities.

Reference to StopSpillet must be done in a manner that makes it easy for the player to find it. This maybe done by providing the telephone number of StopSpillet. The reference to StopSpillet must be given in such a way that the player becomes aware of what is referred to, for example “Spillemyndighedens rådgivningslinje om spilafhængighed StopSpillet / the Danish Gambling Authority's helpline about responsible gambling StopSpillet” or “Helpline: StopSpillet / Helpline: StopSpillet”.

As a supplement, restaurants, cafes and bars may conveniently provide some of the information in a form that can be handed out or taken by the players. It may be flyers with information about StopSpillet.

3.3.1.3 Labelling scheme

It appears from section 19 of the Executive Order on gaming machines in gambling arcades and restaurants that:

Section 19. The Danish Gambling Authority's labelling scheme must be used at the entrance to a gambling arcade and near gaming machines installed at restaurants, cafes and bars. The Danish Gambling Authority's label must be clearly visible to the player.

Subsection 2 The licence holder must at all times use the most recently issued version of the label that is provided by the Danish Gambling Authority. The licence holder must not change the design, proportions or colours of the label.

Subsection 3 The label must not be used in a way that gives the impression that the Danish Gambling Authority is a co-organiser or sponsor.

Subsection 4 The label must not be used by the licence holder's business partners or other parties that do not have a licence from the Danish Gambling Authority.

By 'near to gaming machines' is meant that the Danish Gambling Authority's label must be clearly visible to the player from all gaming machines.

The requirement for the Danish Gambling Authority's labelling scheme to be used means that the Danish Gambling Authority's label must be clearly visible to the player at the entrance to a gambling arcade or near gaming machines installed in restaurants, cafes and bars.

The main purpose of the labelling scheme is to create a safe gambling market and help the player to understand which gambling operators are licenced to provide gambling in Denmark. To comply with the purpose, the label must be used in such a size that the text on the label “Tilladelse fra Spillemyndigheden / Licence from the Danish Gambling Authority” is readable so that players who are not familiar with the label can tell that the gambling operator is licensed by the Danish Gambling Authority.

The Danish Gambling Authority's label shows that the gambling operator holds a licence from the Danish Gambling Authority and that the Danish Gambling Authority supervises the licence holder.

The most recent version of the label can be downloaded from spilmyndigheden.dk. The label must be used exactly as it is and must not be changed in any way. This means that the label cannot be used in e.g., black and white or in toned down colours.

For more information about the Danish Gambling Authority's labelling scheme, please see [Guidelines for using the Danish Gambling Authority's label](#).

4 The duty of attention - technical requirements

4.1 Online casino and online betting

4.1.1 Background to technical requirements

As reviewed in section 3.2.1.2, it follows from the Executive Order on online betting section 16(1)(1) and executive order on online casino section 22(1) that:

Section 16/section 22. The licence holder must be familiar with the player's gambling patterns and must take measures to prevent the player from developing a problematic gambling behaviour and a gambling addiction.

Thus, the licence holder has a special duty to pay attention to ensure the prevention of the player developing a problematic gambling behaviour and a gambling addiction.

It follows from the preparatory works to the Danish Act on Gambling particularly regarding online gambling that online provision of gambling activities further the need for extensive consumer protection as these games provide constant access to gambling activities with no personal contact between the player and the licence holder and players can quickly lose large amounts of money and develop problematic gambling behaviours.

Online provision of gambling activities thus furthers the need for increased consumer protection compared to provision of land-based gambling activities.

On the other hand, it is also emphasised that the technology in the online sector allows for initiatives to prevent the development of problematic gambling. Below is a framework for how the duty of attention, according to the Danish Gambling Authority's assessment, can be met.

As a result of the duty of attention, the licence holder is required to identify players whose gambling patterns indicate problematic gambling behaviour.

4.1.2 Construction of statistical models

4.1.2.1 Identification of players with problematic gambling behaviour

The ongoing characterisation of a player's gambling patterns is made in several ways. In principle, person with the proper knowledge of this can review all players' history on an ongoing basis. However, in practice, some type of automatisisation is to be expected. This can both be explicit in the form of, for example, a point score or implicit method in the form of machine learning, where it is attempted to repeat former assessments made whether it is defined by professional assessments of selected players or analysis of whether selected players with certain patterns complied with some predefined criteria for gambling problems at a later time. What matters is that the method is suitable for identifying problematic gambling behaviour.

There are no clear and general objectives for how to identify problematic gambling behaviour in gambling data and problematic gambling can occur differently across players and types of gambling activities.

Therefore, to comply with the duty of attention, the licence holder should use methods that are suited for their data.

To develop procedures or methods for identifying players with problematic gambling behaviours, it may be necessary to have professionals or statistical models learn from examples of gambling data. Professionals can, for

example, be authorised psychologists, doctors with relevant specialisation or others healthcare professionals with experience within the field of compulsive gambling.

Compulsive gambling is, as described in section 2.2, a clinical condition and assessment of whether a player meets the diagnosis criteria requires partly relevant medical background and partly information beyond gambling data. Thus, the licence holder neither has the obligation nor the opportunity to assess players in any clinical sense.

Instead, it is permitted to use indirect objectives (surrogate objectives) for problematic gambling behaviour to select examples of gambling patterns indicating unproblematic or problematic gambling behaviours. This may include self-exclusion, self-assessment tests, or assessments of gambling data performed by professionals with relevant backgrounds.

As reviewed in section 2.2.1, in 2021 it was estimated that 478,000 persons in Denmark had gambling problems to a varying degree. The share of players with problematic gambling behaviour may be assumed to vary between player segments and types of gambling activities, but in general, it is expected that the majority of the players' gambling patterns do not indicate problematic gambling behaviour.

A model that in all cases identify the players' gambling patterns as unproblematic will be correct in more than 90 per cent of cases but will be useless in identifying players who show signs of problematic gambling.

Methods for analysing gambling patterns should therefore be arranged so that both players with problematic and unproblematic gambling behaviours can be identified with a reasonable success rate.

In the design of the models, it is permitted to explicitly differentiate between several levels of problematic gambling behaviour. This enables more targeted initiatives towards different types of players.

4.1.2.2 Selection of markers

Based on the licence holder's data set, the research literature can be scanned to identify parameters that quantify and qualify relevant behavioural markers. They may be:

Stakes and winnings – including the player's loss.

Time spent – how much time is spent gambling per day?

Time of day – does gambling occur at certain times of the day?

Type of gambling activity – are the majority of games played decided quickly?

“Chasing losses” – does the gambling pattern indicate that the player attempts to win back losses?

Increased willingness to take risks – does the player take bigger risks when gambling compared to other players?

The above is only examples of parameters that can be used. Thus, other and more criteria than those mentioned can be used, and there is no specific requirement for how many criteria to use. A single criterion will not suffice, and the criteria must be combined.

Interactions between markers should also be taken into account, insofar as this is important for the accuracy of the model. This means that the interpretation of each marker should depend on the other markers and cannot stand alone.

Please notice that information on money transfers (deposits, withdrawals, change of cards, annulment of withdrawals etc.) are only gambling patterns in an extended understanding of the term, but these can also be included in the fulfilment of the provision. Data on money transfers cannot stand alone. Data on the game itself must also be included to a significant extent. Thus, it is also completely sound to ignore data on money transfers and instead look at stakes, winnings etc. which will provide the same information as deposits and withdrawals over time.

It should also be noted that demographic data such as age, sex, ethnicity, geographical location etc, cannot be interpreted as game data. Thereby these types of data cannot be part of the analysis of the gambling pattern.

4.1.2.2.1 *Money spent*

A high spending is a special problem because it can cause far-reaching and long-term consequences for the player within a short time period. Therefore, the licence holder must have procedures that ensure that the player is examined before the player has lost substantial amounts of money. The examination should not await the usual analysis of gambling patterns if this is not updated regularly.

It will always be individual, how much a player can afford to gamble. Similarly, there will always be variations in when gambling interferes with the player's life in a disruptive way. Therefore, a compulsive gambler may be able to afford gambling, yet it may, in other ways, interfere with the player's life in a disruptive manner.

Thus, the amount spent on gambling can never be the only marker a licence holder uses to comply with its obligation to offer responsible gambling.

4.1.2.3 Selection of statistical models for machine learning

It is both permitted to use methods that use explicitly defined markers and methods, where markers are not explicitly defined, for example artificial neural networks. However, it should be noted that a model without access to explicitly defined markers must have access to the data that enables implicit representation of the markers that are presumed to be relevant. That is, the model itself has the ability to identify the connections that relevant markers express, also in the instances where the outcome may not necessarily be otherwise explained or identified than by the use of machine learning.

There is no requirement as to whether regression or classification models are used.

Regression model – characterised by assigning a score and ranking on a scale.

Classification models – characterised by categorisation.

Thus, using a regression model, each player will be assigned a score and ranked on, for example, a scale from 1- 10 depending on an assessment of how problematic the player's gambling is.

Using a classification model, each player will be categorised, for example as a recreational gambler, at-risk gambler, problem gambler or compulsive gambler.

4.2 Land-based games

Land-based games do not have the same technical measures to detect and identify problematic gambling behaviour as is the case for online casino and online betting. Therefore, the gambling legislation does not require that land-based operators make themselves familiar with the players' gambling patterns as the executive orders on

online casino and online betting do. However, this does not mean that licence holders in the land-based sector are exempted from intervening against players who show signs of a problematic gambling behaviour. Although the duty of attention does not directly appear from the executive orders on land-based gambling, it is implicit in section 1 of the Gambling Act. For more information, please see section 5.2.

5 Duty of attention - Measures and interventions

5.1 Online casino and online betting

As a result of the duty of attention in the executive orders on online casino and online betting, and the terms and conditions that may be stated in the licence holder's licence, the licence holder is obligated to take appropriate measures and intervene against players whose gambling patterns indicate a need for this.

To prevent and hinder problematic gambling is considered two independent objectives. It is not sufficient to merely intervene against players who show signs of being a problem gambler or a compulsive gambler. Preventive actions must also be targeted at-risk gamblers, to prevent a low degree of problem gambling developing into compulsive gambling.

Furthermore, as part of the general responsibility measures, preventive measures must be taken against all players.

Preventive measures may both be passive and active.

Passive measures – all responsibility measures taken by the licence holder to prevent and hinder problematic gambling that are not specifically aimed at the individual player.

Active measures – all responsibility measures that are aimed at the individual player or a group of players on the basis of his or their specific and current gambling behaviour.

Staff with customer contact will play a role in the preventive work and must be trained to recognise patterns, language and tone in dialogues that may indicate that a customer's gambling activities are no longer for entertainment purposes but are beginning to stress the customer.

The licence holder must take an interest in the effect of the measures and must evaluate and develop its responsibility measures regularly. The licence holder must also in immediate continuation of responsibility measures evaluate whether the players react, respond and act as intended to the measures and must, in a broader sense, be interested in the effect of the measures aimed at the players. The licence holder cannot be said to prevent and hinder problem gambling if the licence holder is aware that the measures do not cause a real positive change in the gambling behaviour.

5.1.1 Passive measures

Passive measures may include when a licence holder on its website or user interface informs of responsible gambling and the potentially harmful effects of gambling, refers to the register of self-excluded players (ROFUS), refers to the Danish Gambling Authority's helpline about responsible gambling and compulsive gambling (StopSpillet) and similar. The passive measures should be made in a design and language that makes it easy for the recipient to decode the content and relate to their own gambling. It can be in the shape of concrete messages encouraging the recipient to act in a specific, responsible way, for example, taking a break from gambling, or considering their current deposit limits.

Standardised pop-ups or standardised e-mails about responsible gambling that are sent to all players regardless of time and money spent or gambling behaviour should be made in a similar, clear way and stress the positive advantages by using the responsible gambling tools.

5.1.2 Active measures

Active measures are interventions aimed directly at players based on their specific and current gambling behaviour that can motivate players to regulate their gambling activities to a moderate level. This may be communication in the form of pop-ups, e-mails or phone calls, providing feedback to the player about current losses and deposits and thereby increase the player's attention to balance in money spent. The licence holder can also send a report to the player summing up the gambling history and gambling behaviour. The report may compare the player's data to data from other players with the licence holder. This type of individualised normative feedback can only be used in the parameters where the players behaviour negatively deviates from a healthy gambling pattern so that the communication never normalises parameters that makes the message work as an incentive to increase the gambling spend.

The type of intervention must be relevant to the individual player and should be adapted to the player's current gambling pattern. Type and extent of interventions should be adapted to the player's level of problematic gambling behaviour.

To help players to think and act responsibly in relation to their gambling, the dialogue with the player should hold information which in a simple and clear way presents a summary of the player's gambling history with special focus on the behavioural characteristics that indicate that the player has problems regulating the gambling activities.

The player must also actively be made aware of the advantages of using responsible gambling initiatives, for example deposit limits and self-exclusion, and information about help offers, including StopSpillet, ROFUS and state-funded treatment options. This may be done both in writing and verbally.

It is clarified that the obligation to make active interventions can be met although the licence holder deviates from an otherwise standardised intervention program if the player responds inappropriately to the interventions. A player who responds dismissively and declines contact should not necessarily be treated in the same way as a player who responds more positively. On the contrary, it is considered appropriate to adapt and target interventions as best as possible to the specific player.

Thus, the obligation is not necessarily met simply because the licence holder has used its ordinary intervention procedures.

A player's request not to be contacted or disturbed can never take away a licence holder's obligation to prevent and hinder problematic gambling. The obligation does not lapse because the player considers himself to be fine and declines further contact.

A player's denial of concrete signs of a gambling problem must not automatically be trusted as truth by the licence holder. Players who are negatively affected by gambling may find it difficult to acknowledge their problems. Similarly, players may experience an urge to gamble to such an extent that they refuse having a problem for fear of being excluded from gambling. In interaction with players, licence holders must take into account stressed players' lack of control over their own thoughts and actions and therefore include both subjective and objective assessments when communicating about, for example, players' self-reported control over their gambling activities.

5.1.2.1 Which interventions to choose?

Self-imposed restrictions such as deposit limits set by the player is most often preferred over forced

exclusion. If a licence holder immediately closes the player's account without taking other measures, the player will simply be able to continue gambling with another operator. Instead, the licence holder can limit the player's consumption in another way, for example, by compulsively setting a deposit limit, place restrictions on the player's time consumption, exclude the player from certain types of games etc.

5.1.2.2 Language

It appears from section 14(1) of the Executive Order on online casino and section 12(1) of the Executive Order on online betting that all communication between the players and the licence holder must be able to take place in Danish.

The Danish Gambling Authority considers it a breach of the rules on responsible gambling if the communication from the licence holder to the player about responsible gambling does not take place in Danish, unless the player takes the initiative to use another language. In this connection, the Danish Gambling Authority notes that communication about responsible gambling is often intended for players who are in an especially vulnerable situation and therefore, the language must not pose as an additional barrier.

5.1.3 Additional responsible gambling measures

Some licence holders offer additional gambling restrictions than those required by the gambling legislation, for example, loss limits as a supplement to deposit limits and time restrictions or gambling restrictions as a supplement to self-exclusion.

It is allowed to offer players additional tools as long as the additional offers do not replace the statutory options of limitations.

If the licence holder chooses to offer additional limitation options, the licence holder must very clearly call inform the player of what is offered. If, for example, a loss limit is offered, it must apply to all games, unless it very clearly is stated that the games are differentiated.

5.1.4 Areas requiring special attention

5.1.4.1 Contact between player and licence holder

The licence holder should also in their internal rules and procedures and in their training of employees state that the employees should react if players, for example:

- Imply having gambling problem
- State that they cannot control their gambling activities
- Display a threatening behaviour
- Claim that the games are rigged
- Mention financial issues, mental disorders, self-harm or suicide
- Frequently and persistently request bonuses
- Express aggression or desperation by requesting bonuses
- Attempt to pressure staff to approve withdrawals, bonuses, change of deposit limits, or annulments of withdrawals
- Complain about losses

- Display impatience, are vociferous or irritable.

Licence holders must also be especially attentive to players' language and tone, examine gambling behaviours and contact players if players in contact with employees, for example, via chat, email or phone mentions words such as:

- Compulsive gambling
- Gambling addiction
- Gambling disorder
- Addicted
- Alone
- Lonely
- Divorce
- Debts
- Rent
- Interest rate
- Mortgage
- Suicide
- Help
- Bankrupt
- Loss of control
- Lack of control
- Lost job

5.1.4.2 Bonus offers and marketing

In connection with responsible gambling, the licence holder must display special caution when awarding bonus offers and by using other sales promotions.

It appears from section 23(2) of the Executive Order on online betting and section 30(2) of the Executive Order on online casino that:

Subsection 2. A player's inactivity at the licence holder must not be a criterion for section when awarding sales promotion offers.

Thus, bonuses cannot be awarded based on a player's inactivity. At the same time, the licence holder should pay special attention to players who request bonuses themselves, as this may indicate that the player need to gamble but cannot afford to gamble.

The Danish Gambling Authority assesses that it is not in compliance with the requirement of sections 16 and 22 of the online executive orders stating that the licence holder must take measures to prevent and hinder the player from developing a problematic gambling behaviour and compulsive gambling of the player is encouraged to increase the consumption by, for example, bonus and VIP offers if the player shows signs of problematic gambling behaviour at the same time. It is also not in compliance with the legislative intent of section 1 of the Gambling Act, particularly including that the consumption of gambling must be kept at a moderate level, and that players must be protected to the greatest possible extent against developing a problematic gambling behaviour.

For more information about marketing and bonus offers, please see [the Danish Gambling Authority's guide on sales promotion](#).

5.1.4.3 High rollers

Some licence holders offer particularly favourable conditions for high rollers or VIP customers, who are offered, for example, special bonuses, gifts, participation in VIP events etc. If the licence holder makes use of this, it requires that the licence holder pays special attention to danger signs in relation to responsible gambling even though the player is a valued customer with the licence holder. The licence holder must actively ensure that persons with problematic gambling behaviour do not become part of the licence holder's customer loyalty programmes and other marketing measures.

5.2 Land-based games

As stated in section 4.2 it is implicit in section 1 of the Gambling Act that licence holders of other types of games than online casino and online betting should have procedures regarding responsible gambling, to make employees aware of behaviour that indicates problematic gambling.

With the duty of attention comes an obligation to exercise responsibility towards the players who exhibit signs of danger. This may be done by having a conversation with a player who gambles large amounts of money, exhibits aggressive behaviour when losing a game, requests to gamble on credit, borrows money from other players or similar. Written information about StopSpillet and treatment offers may also be provided. The Danish Gambling Authority expects that operators of land-based games have procedures that ensure attention to behaviour that may indicate problematic gambling behaviour.

When preparing procedures, the licence holder can look for inspiration in their procedures for prevention of money laundering, since the areas requiring attention in relation to responsible gambling in some areas will coincide with obligations set out in the anti-money laundering legislation. For example, the size of stakes and winnings and the player's behaviour of interests both in connection with money laundering and in connection with responsible gambling. With regard to the gambling sectors exempted from the AML Act, inspiration can be found in the obligation to notify, which applies to all licence holders. For more information, please see [the Danish Gambling Authority's guidance on preventive measures against money laundering and financing of terrorism](#).

6 Outsourcing and third-party assistance

The licence holder may choose to entrust a third party with the various obligations, for example, the analysis of gambling patterns, contact with players with a problematic gambling behaviour etc.

However, it is always the one who establishes the customer relationship – that is the licence holder – who is responsible for ensuring that the rules and obligations relating to responsible gambling are complied with.

If a licence holder uses assistance from a third party, the licence holder must ensure that the third party meets the requirements for record keeping and that the processing of personal data is carried out in accordance with the rules of the general data protection legislation.

7 Responses in case of lack of compliance

7.1 Penalty

As described in section 2 on the legislative intent of the Danish Act on Gambling, one of the main purposes of the gambling legislation is to ensure responsible gambling. This means that all other interpretations of the legislation must consider responsible gambling.

The legislative intent is not penalised, which is why a licence holder cannot be independently punished for failing to provide gambling in a responsible manner.

However, it appears from section 59(5)(3) of the Danish Act on Gambling that:

Subsection 5 Unless a more severe penalty is caused in accordance with other legislation, any person who intentionally or with gross negligence

(...)

3) violates conditions set in accordance with section 32.

This means that if a licence holder violates the conditions to provide gambling responsibly, which may be stated in the conditions for the licence, it may be punishable by fine.

It may also be punishable by fine if the rules on responsible gambling stipulated in the executive orders are violated.

In practice, the Danish Gambling Authority will report a licence holder to the police, who is subsequently responsible for any further investigations and prosecution.

The Danish Gambling Authority report to the police violations in cases that involve gross or repeated violations.

7.2 Other responses than penalty

7.2.1 Injunction

If the Danish Gambling Authority find that a licence holder fails to comply with the rules on responsible gambling, the Danish Gambling Authority can impress the rules upon the licence holder, including making critical statements or the like.

7.2.2 Revocation of a licence

Ultimately, a licence holder's failure to comply with the rules on responsible provision of gambling may lead to a revocation of the licence to offer gambling.

It follows from the Danish Act on Gambling section 44(1) that:

Section 44. The Danish Gambling Authority can revoke a licence to provide gambling offers if the licence holder or its representative

1) has grossly or repeatedly violated this Act, provisions made under this Act or the terms of the licence.

In practice, the Danish Gambling Authority, with an injunction and a police report, will attempt to make the licence holder act in accordance with the rules. In case of gross or repeated violation, the licence may be revoked.

Apart from the objectively ascertainable requirements in the gambling legislation, for example the requirements for information to the player in the executive orders, where it can be objectively ascertained whether the licence holder has complied with the rules or not, it will always depend on a specific assessment of the individual case, whether the licence holder has met its obligations to offer gambling responsibly. The response to the violation will also always rely on a specific assessment.

8 Contact the Danish Gambling Authority

More information is available at www.spillemyndigheden.dk.

If you have any questions, you are welcome to contact the Danish Gambling Authority via our contact form at www.spillemyndigheden.dk/en/contact, where you can choose a subject and send encrypted digital mail.

You are also welcome to contact the Danish Gambling Authority at telephone number +45 72 38 79 13.