

Report on the assignment in the Swedish
Gambling Authority's appropriation
directions (Fi2022/03391): Understanding
and developing the self-exclusion register
(Spelpaus.se)

Contents

| | |
|--|----|
| Summary | 3 |
| 1 Government assignment | 4 |
| 2 Background: National self-exclusion register Spelpaus.se..... | 5 |
| 2.1 Data collection methodology..... | 6 |
| 3 Results of data collection | 9 |
| 3.1 Investigation of reasons for exclusion in Spelpaus.se and gambling with unlicensed gambling companies | 9 |
| 3.1.1 Reasons for exclusion on Spelpaus.se - problems limiting gambling and seeking to avoid marketing..... | 9 |
| 3.1.2 Gambling with unlicensed gambling companies - online casino games, slots and betting most common forms of gambling during the exclusion..... | 11 |
| 3.2 Conditions for and necessity of additional exclusion periods in Spelpaus.se as well as need for advice and support..... | 13 |
| 4 Reflections and conclusions | 20 |
| 4.1 Spelpaus.se is used by people who need support to limit their gambling..... | 20 |
| 4.2 The importance of support for problem gambling | 20 |
| 4.3 Preventing and discouraging gambling during exclusion | 21 |
| 4.3.1 Dissemination of knowledge | 23 |
| 4.3.2 Preventing misuse of data in Spelpaus.se | 23 |
| 4.3.3 Payment service providers may not transfer payments from persons on the national self-exclusion register to unlicensed gambling operators.. | 23 |
| 4.4 Self-excluding from different forms of gambling..... | 24 |
| 4.5 Increasing choice of exclusion periods..... | 26 |
| 5 Strengths and limitations of data collection..... | 27 |

Summary

This report is based in part on data collected regarding reasons why people use Spelpaus.se to self-exclude from gambling and how many people gamble despite self-exclusion, as well as data collected regarding expanded options for self-exclusion from gambling on Spelpaus.se.

Data collection shows that the most common reasons for self-exclusion from gambling are current or previous problems limiting gambling, a loved one who wants the individual to self-exclude and a desire not to receive marketing messages. Fewer than half reported gambling during their exclusion. About half would like to self-exclude from specific forms of gambling. Half report wanting more exclusion periods. The Swedish Gambling Authority intends to investigate the issue of exclusion from individual licence types, more exclusion periods and the possibility of extending an exclusion.

Data collection also revealed a desire to be able to self-exclude from all gambling, including gambling on unlicensed sites. The Swedish Gambling Authority, in consultation with the Public Health Agency of Sweden, will identify possible exclusion tools and investigate their suitability for the Swedish gambling market. Another need that emerged from data collection is that gamblers want to be able to self-exclude from gambling transactions with payment service providers.

During data collection, the Swedish Gambling Authority and the Public Health Agency of Sweden have also asked about the desire for voluntary counselling among those self-excluding from gambling. The majority have stated that they do not need voluntary counselling. However, those who experience difficulties in limiting their gambling are slightly more positive towards being contacted for counselling. The Swedish Gambling Authority will evaluate how the website Spelpaus.se can be developed to better facilitate support and assistance efforts.

Government assignment

In the Swedish Gambling Authority's appropriation directions for 2023 (Fi2022/03391), the Authority is tasked with mapping out

- reasons why people exclude themselves from gambling via the national self-exclusion register Spelpaus.se; and
- what proportion of those who exclude themselves from gambling were customers of gambling companies without a Swedish gambling licence, as well as investigating the conditions for and necessity of being able to offer additional or alternative options for exclusion on Spelpaus.se in terms of both periods and forms of gambling.

The assignment shall be reported no later than 31 October 2023 to the Government Offices (Ministry of Finance).

Background: National self-exclusion register Spelpaus.se

Origins of the self-exclusion register

As early as 2014, the European Commission recommended that all Member States offer the option of self-exclusion from online gambling services. In connection with the 2019 reregulation of the Swedish gambling market, the national self-exclusion register Spelpaus.se came about. The service provided gamblers the option to self-exclude from all gambling with gambling companies licensed in Sweden, where registration is obligatory for gamblers. With the new Gambling Act (2018:1138), a licence holder must, according to Chapters 5 through 8 of the said Act, give registered gamblers the option of self-exclusion from gambling for a certain period or until further notice. Furthermore, marketing may not be targeted directly at gamblers who have opted for self-exclusion from gambling.¹

The self-exclusion register today

Since 1 January 2019, the self-exclusion register Spelpaus.se has become well known among gamblers. The latest survey by the Swedish Gambling Authority, *Allmänheten om spel 2022*, showed that 62 percent knew of the existence of Spelpaus.se². In *Spelvanor online 2023*, the Swedish Gambling Authority's survey aimed specifically at online gamblers, three quarters reported being aware of the self-exclusion register but had not used it, and just over a tenth had used it.³ However, in the Public Health Agency of Sweden's latest survey, only 32 percent reported being aware of Spelpaus.se.⁴ The proportion of the population who are aware that Spelpaus.se exists is higher among men than among women.⁵ In October 2023, 99,496 people were excluded on Spelpaus.se (Table 1). Of these, approximately 75 percent were men and 25 percent women.

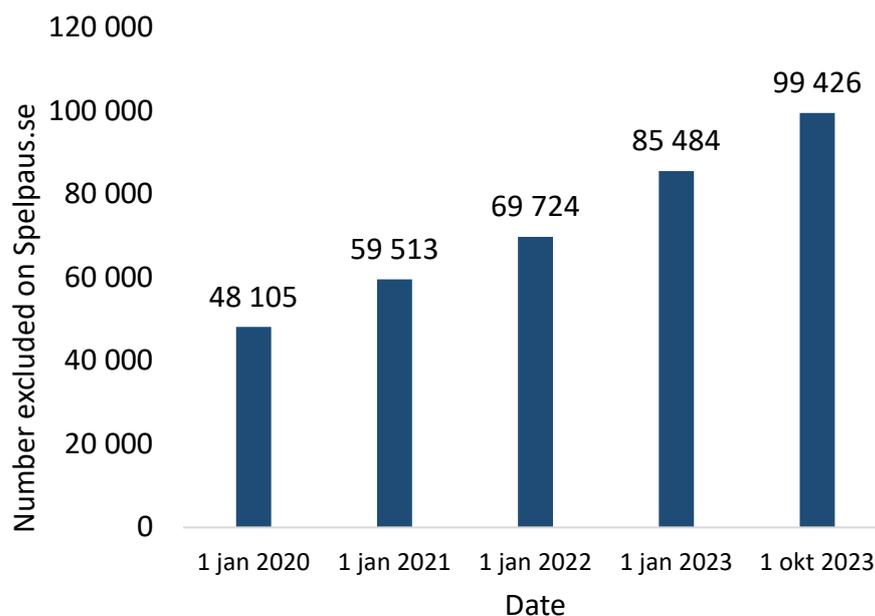
¹Chapter 15, Section 2 Gambling Act

² Swedish Gambling Authority, *Allmänheten om spel 2022*.

³ Swedish Gambling Authority, *Spelvanor online 2023*.

⁴ A review in Great Britain has shown that estimates from longitudinal studies were found to be two to four times higher than population studies.
<https://doi.org/10.1016/j.puhe.2021.12.014>

⁵ Public Health Agency of Sweden, *Swedish longitudinal gambling study (Swelogs), Tabellsammanställning 2021*.

Table 1. Excluded on Spelpaus.se

However, the reasons why people self-exclude using Spelpaus.se are less clear. To gain a better understanding of these reasons, the Swedish Gambling Authority, in consultation with the Public Health Agency of Sweden, has conducted a survey consisting of two data collections aimed at those excluded on Spelpaus.se.

2.1 Data collection methodology

The data collections have two parts with different samples. This is because Spelpaus.se currently has an application with a technical limitation allowing only two questions to be asked, and these are not linked to each other. Therefore, two questions were initially asked via the website www.spelpaus.se when self-exclusion was made (hereafter referred to as Part 1). To make collection more comprehensive, an online survey with 19 questions was added and distributed through other channels (hereafter referred to as Part 2). The two data collections are briefly described below.

Part 1 aimed to contact people immediately after they had self-excluded from gambling on Spelpaus.se and investigate their main reason for exclusion. The questions were available on Spelpaus.se from 11 January to 3 May 2023. The responses collected did not contain traceable personal data.

When excluding oneself on Spelpaus.se, you are provided with informational text about self-exclusion. During data collection, this text was followed by a request to participate in the survey and answer two brief questions. The questions were visible without the respondent having to click through to the survey.

The question regarding the main reason why people self-exclude on Spelpaus.se was answered by 5,835 people. The proportion of men was 71 percent and women 29 percent.

The question regarding how long they had considered self-exclusion before acting was answered by 5,503 people. As with the previous question, men accounted for 71 percent and women for 29 percent.

In Part 2 of data collection, the Swedish Gambling Authority, together with the Public Health Agency of Sweden, conducted a 19-question survey. The survey addressed those who had been excluded for a long time as well as those who had recently self-excluded. The aim was to consider:

- why individuals self-excluded on Spelpaus.se
- whether those self-excluding wish to be contacted with help (for gambling problems)
- whether those self-excluding have gambled since exclusion
- whether options for other time periods are requested
- or the option to self-exclude from specific types of gambling.

The survey was distributed via the websites of Swedish national gambling helpline, the Swedish Gambling Authority, the Public Health Agency of Sweden, Spelberoendes riksförbund and Spelfriheten. It was also sent to all municipalities in Sweden, asking if they could forward it to the proper recipient in each municipality. The survey was available for just over four weeks, between 27

March and 25 April 2023, and was accessed via a web link. Responses collected did not contain any traceable personal data.

There were 607 responses from people who stated that they were or had been excluded on Spelpaus.se. Of these, 76 percent were men and 24 percent women. Almost half (48%) had been excluded for more than 12 months and one fifth for 6 to 12 months.

Under the heading "Group of problem gamblers", the Swedish Gambling Authority has merged two response categories: in one, the main reason for exclusion was a difficulty limiting gambling, and in the other, the main reason was a loved one who wants the individual to self-exclude. The Authority considers that this combined group shows signs of gambling problems. This is because, in the Problem Gambling Severity Index (PGSI), an indicator of problem gambling is if "people criticised your betting or told you that you had a gambling problem, whether or not you thought it was true". In Part 2, this group consisted of 426 people, 76 percent of whom were men. The report refers to this group as *problem gamblers*. However, this should not be interpreted as meaning that no gambling problems exist among the other groups. Problem gamblers likely exist in other groups as well. Nevertheless, this group is important to recognise as they most explicitly report problems with their gambling.

Results of data collection

3.1 Investigation of reasons for exclusion in Spelpaus.se and gambling with unlicensed gambling companies

The two areas which the Swedish Gambling Authority has been tasked with surveying are presented below.

3.1.1 Reasons for exclusion on Spelpaus.se - problems limiting gambling and seeking to avoid gambling marketing

In accordance with the assignment, the reasons why people have chosen to self-exclude on Spelpaus.se are presented here. We begin by describing how well-considered the decision to self-exclude was.

Most people decide to self-exclude on short notice

Part 1 included a question regarding the period of consideration prior to self-exclusion. This question was intended to provide an initial indication of how well-considered the decision to self-exclude was. The results showed that decisions were most commonly made within one day or even less (41 percent). Approximately one fifth of respondents (2%) considered self-exclusion for more than six months before making the decision.

Difficulty limiting gambling the most common reason for self-exclusion

The most common reason for self-exclusion from gambling was problems limiting gambling (Table 2). Second most common was a desire not to receive gambling adverts.

Table 2. Main reason for exclusion (Part 1 and 2)

| Main reason | Part 1 (%) | Part 2 (%) |
|---|---------------|---------------|
| I have/have had problems limiting my gambling | 60 | 65 |
| A relative/friend has a gambling problem | 6 | 5 |
| A loved one wants me to self-exclude | 3 | 7 |
| I don't want to receive gambling adverts | 14 | 10 |
| Other | 17 | 12 |

Of the respondents, 72 percent were men. Of these men, 73 percent chose 'problems limiting my gambling' as the main reason for self-exclusion from gambling.

An equal number of men and women chose 'I don't want to receive gambling adverts'. The proportion who stated that they self-excluded because they had a relative/friend with a gambling problem was higher among women (9%) than among men (5%), which was statistically significant.

Under the heading 'Other', around 30 people provided answers, and the single most common was that they "self-excluded by mistake". Furthermore, several described taking "a break from gambling" when they feel that they have been gambling too much or need to save money, but that they do not intend to stop gambling completely. There were also several comments about their own gambling problems:

"On the same day that my gambling break expired, I gambled away 1.4 million, I even lost the money for the house and the company!"

Many seek to avoid 'gambling adverts' - regardless of the reason for exclusion

The survey asked how important it was to avoid gambling adverts. The question referred to all direct marketing for gambling. In the survey question, however, it is formulated as "gambling adverts", as this is often how gamblers refer to marketing sent by licence holders.

Regardless of their main reason for exclusion, gambling marketing is something that many people seek to avoid. Forty-one percent of women and 32 percent of men considered it very important to avoid gambling marketing. This response was most common among people aged 45–64 (4%) and least common among those aged 18–24 (18%). Among problem gamblers, 47 percent considered this important or very important when choosing to self-exclude. Loved ones also felt that it was important to avoid gambling marketing.

During exclusion on Spelpaus.se, marketing may not be directed at gamblers.⁶ However, in this survey, just over half reported receiving direct marketing of gambling during their exclusion. It is not known, however, where this marketing comes from, whether from unlicensed operators or operators with a licence in Sweden. Nor does the Swedish Gambling Authority rule out the possibility that marketing may come from gambling licensees for public benefit purposes, which need not be connected to Spelpaus.se.

3.1.2 Gambling with unlicensed gambling companies - online casino games, slots⁷ and betting most common forms of gambling during the exclusion

A minority of respondents (41%) have gambled during their exclusion. Of these, 71 percent played online casino games and slots, while 25 percent placed bets online during their exclusion (Table 3). This study has adopted the assumption that gambling in these forms largely takes place exclusively with unlicensed operators in the event that the gambler has been excluded.⁸ Considering all respondents, this means that approximately 37 percent are most likely to have gambled with unlicensed gambling companies.

⁶Chapter 15, Section 2 Gambling Act

⁷ This report uses the term 'slots' to refer to what, in Chapter 7, Section 1, is referred to as 'computer-simulated gambling machines'.

⁸ However, it cannot be excluded that some have gambled with licensed companies while using the login credentials/electronic ID of others.

Table 3. Types of gambling by respondents during exclusion.

| Type of gambling | Percentage (%) |
|-------------------------------|----------------|
| Online casino games and slots | 71 |
| Online betting | 25 |
| Private gambling with friends | 17 |
| Lottery tickets in shops | 19 |
| Bingo | 7 |
| Other | 9 |

However, upon a closer look the Swedish Gambling Authority finds that, among problem gamblers, a greater proportion, just over half (53%), have gambled during exclusion. The group most likely to gamble under exclusion is nevertheless those who do not want to receive gambling adverts (88%).

Table 4. Types of gambling by excluded problem gamblers during exclusion (Part 2).⁹

| | Male problem gamblers who gambled during exclusion (%) | Female problem gamblers who gambled during exclusion (%) | All problem gamblers who gambled during exclusion (%) |
|---------------------------------|--|--|---|
| Online casino games and slots | 68 | 88 | 71 |
| Online betting | 28 | 15 | 25 |
| Private with friends | 20 | - | 16 |
| Bought lottery tickets in shops | 17 | 22 | 18 |
| Bingo | 4 | 15 | 7 |

⁹ It was possible to indicate several types of gambling.

3.2 Conditions for and necessity of additional exclusion periods in Spelpaus.se as well as need for advice and support

According to its assignment, the Swedish Gambling Authority must study the conditions for and necessity of offering additional or alternative options for exclusion on Spelpaus.se. The Authority has also studied further needs of people using the register to self-exclude.

Requests to self-exclude from all gambling

The survey asked questions regarding the need for more exclusion options and questions concerning measures to make it more difficult to gamble while excluded on Spelpaus.se. The survey allowed for open-response answers, and these responses has been grouped according to the measures/changes that respondents felt were necessary to prevent gambling or make it more difficult while excluded.

- Blocking foreign unlicensed casinos or further support to limit gambling on unlicensed websites
- More support options through, e.g., links to support organisations
- A universal deposit limit for all gambling
- National exclusion from individual gambling sites or forms of gambling
- Contact persons, or the possibility to notify relatives of exclusion to be informed when exclusion is lifted
- Restrictions on gambling loans

The responses make it clear that respondents consider it easy to circumvent their exclusion on Spelpaus.se. Opinions differ regarding whether and how this should be addressed, or even if it can be addressed. Many respondents state that it should be possible to self-exclude from all gambling, including unlicensed gambling.

"It would help if you could self-exclude from foreign casinos.

Gambling breaks are good, but do not work in practice since unlicensed gambling sites are always available. A gambling addict will find other ways to gamble. Spelpaus.se should cooperate with banks, etc., to block

the accounts/cards of excluded gamblers from all gambling-related transactions, completely blocking them from all gambling-related activities. Or an app, etc., with a similar locking function that cannot be unlocked after a certain time."

"Make it possible to self-exclude from gambling sites without a Swedish gambling licence. In any event, sites with Swedish payment options"

"Regarding extra information for the website, address ADHD/ND diagnoses, refer to Attention or other organisations. I have three million in debt that is not solely due to gambling, but definitely a lot of it is due to gambling. Getting away from gambling altogether will never be possible as long as we have a free internet, but co-operation among several actors, and not simply a break from gambling, would probably help."

According to the survey, almost 23 percent of respondents have used self-exclusion tools other than Spelpaus.se while 32 percent have never heard of such tools. Among those who find it difficult to limit their gambling, the proportion who have used other self-exclusion tools is similar (25%), as is the proportion who have never heard of them (34%).

There is also a demand for the option to self-exclude from payment service providers and to somehow restrict the possibility of taking out loans. Requests resemble the ones below.

"You should be able to self-exclude from all types of loans just as you can take a gambling break. At present, that is not possible, and lenders with exorbitant interest rates do their best to catch gambling addicts in the trap time and again."

"A similar block would also be needed for consumer loans. This industry exploits gambling addiction and exacerbates its consequences. It is unbelievable that such companies are allowed to lend money to people who take out new loans every month."

We are currently treating a referral regarding the inquiry *Ett förstärkt konsumentskydd mot riskfylld kreditgivning och överskuldssättning* (SOU 2023:38), and the Swedish Gambling Authority intends to address issues related to credit and debt in this context.

A majority wants the option to self-exclude from specific forms of gambling - some see risks

The assignment of the Swedish Gambling Authority includes studying the need for the option to self-exclude from specific types of gambling as well as additional exclusion options. The reason for exploring preferences regarding self-exclusion from specific forms of gambling is a concern that total exclusion would lead some gamblers to avoid self-exclusion, if they feel they have problems with only specific forms of gambling.

The results showed that 49 percent of respondents approved of the option to self-exclude from specific gambling alternatives (Table 5).

Table 5. Option to self-exclude from specific/different forms of gambling

| Responses | Percentage (%) |
|--------------------------------------|----------------|
| Yes | 49 |
| No | 26 |
| The question is not applicable to me | 16 |
| I don't know | 9 |

Among those who responded that "the question is not applicable", half (51%) have self-excluded due to problems limiting their own gambling. This group's interpretation of what is applicable in the context of the response becomes uncertain. Their response might be interpreted as "I would still have to self-exclude from everything" or "I still have problems with all forms of gambling because it triggers increased gambling". There are probably other interpretations of this response.

The most common form of gambling from which people wish to self-exclude is undoubtedly online casino games and slots, as reflected in the open-response answers.

Table 6. Specific gambling forms requested for self-exclusion option

| Type of gambling | Percentage (%) |
|---------------------------------------|----------------|
| Online casino games and slots | 42 |
| Online betting (including off-course) | 11 |
| Poker | 15 |
| Online bingo | 13 |
| Online lotto | 10 |
| Other forms of gambling | 5 |

In terms of different forms of gambling, survey responses show a relatively clear division between men and women. More men than women want to be able to self-exclude from betting (13% and 7% respectively), poker (16% and 9%) and online lotto (12% and 5%), while more women than men want to self-exclude from online casino games (41% and 31% respectively).

Table 7. Gender distribution, requested specific gambling forms for self-exclusion option

| Type of gambling | Women (%) | Men (%) |
|--------------------------------|-----------|---------|
| Online casino games and slots | 41 | 31 |
| Betting (including off-course) | 7 | 13 |
| Poker | 9 | 16 |
| Online lotto | 5 | 12 |

Twice as many individuals (42%) in the group self-excluding to limit their own gambling request the option to self-exclude only from online casino games, compared to those self-excluding for other reasons (21%). This pattern is repeated for betting, with twice as many individuals (14%) requesting the option

to self-exclude only from betting among those self-excluding to limit their own gambling, compared to those self-excluding for other reasons (7%).

Respondents' arguments against introducing the option to self-exclude only from specific forms of gambling can be summarised with the following quotes from the survey:

"One of the questions was about the option to self-exclude from specific forms of gambling. That would certainly not be a good idea. I myself had problems with online casinos in particular, and if I had the opportunity to self-exclude from only that form of gambling, I might have done so. Then the risk is very great that I would have switched to another form of gambling. After several years of self-help meetings, I have realised how important it is to completely abstain from gambling in order not to relapse. One form of gambling can trigger another."

Half want to see more exclusion period choices, particularly longer ones

In addition to other exclusion options for specific forms of gambling, the need for exclusion periods of different lengths than those currently in place was also studied. Respondents were able to choose either longer or shorter periods.

Half of the respondents (50%) thought that there should be greater choice of exclusion periods. Of these, 64 percent thought there should be longer exclusion periods and 27 percent thought there should be shorter periods. One fourth said that they did not know. Overall, there is a greater demand for longer exclusion periods than for shorter ones. The Swedish Gambling Authority is already aware that many people continuously opt to extend their until-further-notice exclusion, which is currently 12 months. Longer exclusion periods have also been requested in previous discussions with the Spelberoendes riksförbund. A quote from the open responses illustrates how vulnerable one feels when the exclusion ends.

"Since after every 12-month period I have asked my family to always check on me, to ensure I've made a renewable FULL lockdown once again for 12 months. The fact that there is a renewable exclusion

after 12 months is just a temptation that I, as a gambler, again have the power to go back to gambling, if I want. Which is only negative and always on my mind. The only thing that works is a total exclusion"

Almost half of those who self-excluded due to difficulties in controlling their gambling have previously sought care or support

Just over one third of survey respondents (38%) have sought professional help. Professional help refers to gambling addiction treatment, peer associations and the Swedish national gambling helpline. This to distinguish such help from the support people might receive from family and friends.

Of those who have sought help, 72 percent sought treatment for their gambling addiction, 38 percent sought help from a peer-support group, 24 percent from the Swedish national gambling helpline and 15 percent have sought other types of help. It was possible to provide multiple answers and it was also possible to provide an open response. Open responses were used to clarify which peer association and which gambling addiction treatment was referred to. Open responses mentioned in particular the 12-step programme and GA.¹⁰ There is no statistically significant difference in gender distribution between those who sought help and those who did not.

Broken down by main reason for exclusion, seeking help for gambling problems is most common among those who have difficulty limiting their own gambling (47%). This is followed by those who have excluded themselves because they have a relative/friend with a gambling problem (43%). The proportion of relatives who have sought help related to gambling problems is relatively high, which can possibly be explained by the sample on which the data survey is based (see page 27).

¹⁰ Gamblers Anonymous.

A majority do not wish to be contacted for voluntary counselling

The majority of respondents answered no (59%) to the question of whether they would like to be contacted for voluntary counselling by, for example, the Swedish national gambling helpline when self-excluding on Spelpaus.se (Table 8).

Table 8. Requesting contact when self-excluding on Spelpaus.se

| Responses | Percentage (%) |
|--------------|----------------|
| Yes | 20 |
| No | 59 |
| I don't know | 20 |

The group self-excluding to limit gambling wants to be contacted to a slightly greater extent than other respondents (22 versus 16%). The groups self-excluding because they do not want to receive gambling adverts and for other reasons show the least interest (10 and 11%). Regardless of the reason for exclusion, significantly more people want to be contacted among those who have already sought professional help (37%) than among those who have not sought help (10%).

Reflections and conclusions

4.1 Spelpaus.se is used by people who need support to limit their gambling

One of the central parts of the assignments is to investigate the reason for exclusion on Spelpaus.se. The reasons for self-exclusion can be numerous and overlapping. However, the survey makes clear that the main reason for self-exclusion was difficulties experienced in limiting gambling or the request of a loved one to self-exclude. In this study, the Swedish Gambling Authority cannot with certainty identify as problem gamblers individuals who self-exclude mainly because a loved one requests them to do so, but the Authority considers it reasonable to make that assumption.

As previously mentioned, Spelpaus.se is originally a tool that aims to provide gamblers the option to self-exclude from licensed gambling and thus reduce the accessibility of gambling. Several individuals report mistaken self-exclusion, or that they were excluded by another person. Such cases may occur. However, exclusion is linked to e-ID, which makes it more difficult for this to happen. There are also individuals who change their minds regarding self-exclusion when the urge to gamble is great and who contact the Swedish Gambling Authority. However, exclusion is irrevocable for the duration of the exclusion period, and there is no possibility for the Swedish Gambling Authority to lift it. In the Authority's opinion, opening up such a possibility would defeat the purpose of Spelpaus.se and would encourage self-excluded individuals to constantly second-guess their decision.

4.2 The importance of support for problem gambling

Self-exclusion is a step towards gambling freedom, albeit for a limited time. For many, this can be seen as a sufficient first step, and they do not feel that help from others is necessary. In the survey, 71 percent of respondents were not interested in being contacted when self-excluding. However, those who self-excluded with the main motive of limiting their gambling want to be contacted slightly more than others (22 and 17%). This result is not entirely surprising. It is common for people to seek help and support from others only after several

unsuccessful attempts to quit over a long period.¹¹ People also commonly start treatment or contact other support services only to interrupt these contacts and return later.¹² The survey shows that the group most likely to be positive towards contact when self-excluding is those who have previously sought professional help.

The Swedish Gambling Authority sees gambling addiction treatment and peer associations as complementing each other, and access to these is important for reaching those who are motivated to quit gambling. Such options are also important in helping to avoid relapses among problem gamblers and the increased indebtedness or other harmful effects of gambling that might arise. In our government assignment (Fi2021/03520) to monitor gambling and problem gambling on the gambling market, we therefore raise the issue of increased resources for peer associations and non-profit organisations that work with support and prevention regarding gambling.

The Swedish Gambling Authority will review the links from Spelpaus.se to the Swedish national gambling helpline and other organisations offering support and help. Consideration should also be given to the possibility of providing contact details and being contacted by a professional support service. The Swedish Gambling Authority intends to look into the technical and legal circumstances that this would require.

4.3 Preventing and discouraging gambling during exclusion

Almost 41 percent of respondents reported gambling during their exclusion. Slightly more than one third of all respondents have gambled online, in the form of betting, casino games or slots, and thus are likely to have gambled

¹¹ Ronzitti, S. Soldini, E. Smith, N. Clerici, M. Bowden-Jones, H. (2017). *Gambling Disorder: Exploring Pre-treatment and In-treatment Dropout Predictors*.

<https://spelberoende.se/> Retrieved 3 July 2023

¹² Nilsson A. Simonsson, O. Hellner, C. (2021). Reasons for dropping out of internet-based problem gambling treatment, and the process of recovery – a qualitative assessment.

Pfund, R A, Peter, S C. McAfee, N W. Ginley, M K. Whelan, J. P & Meyers, A. W. (2021). *Dropout from face-to-face, multi-session psychological treatments for problem and disordered gambling: A systematic review and meta-analysis*.

entirely or mostly with gambling companies that are not licensed in Sweden. A recent survey shows that the group using Spelpaus.se is overrepresented both among those who intentionally patronise unlicensed websites and those who unintentionally gambled outside the licensed market.¹³ Previous surveys have shown that gamblers are not fully aware of whether the website where they gamble is a Swedish gambling license-holder.¹⁴ But after exclusion on Spelpaus.se, it is highly likely that they are gambling on gambling sites that do not have a Swedish licence. Online casino games, slots and betting require a login, which means that the excluded gambler is forced to somehow use the login ID of someone else. Judging from the open responses received in the survey, gambling with unlicensed operators in Sweden is perceived as easy and accessible. Unlike Denmark and Norway, Sweden has chosen not to use IP blocking to make it more difficult for so-called unlicensed gambling. This was not highlighted as an option in the inquiry regarding the re-regulation of the gambling market.¹⁵ Nor is it currently prohibited for individual gamblers to gamble outside the Swedish licence system. However, from the individual's perspective, exclusion is a step to limit their gambling. And to choose to gamble, despite the exclusion, should generally be seen as an expression of problem gambling.

It is very likely that those gambling while excluded are individuals who planned to stop gambling, or at least to gamble less, but who cannot resist the impulse when the urge to gamble becomes too strong.¹⁶ These people would naturally be helped if access to gambling were made more difficult. It is possible to self-exclude from online gambling outside the Swedish licence system, but this is something the individual must arrange for themselves. There are self-exclusion tools that block access to international gambling websites in Sweden. These are designed to externally block out gambling-related searches. Spelpaus.se, in contrast, is based on licensed gambling companies joining the system, which in turn distributes information regarding self-excluded individuals to all affiliated gambling companies. Our survey found that only one quarter of those who find

¹³ Swedish Gambling Authority, *Spelvanor online 2023*.

¹⁴ Swedish Gambling Authority, *Allmänheten om spel 2022*.

¹⁵ *En omreglerad spelmarknad*. SOU 2017:30 Part 2. p.144f

¹⁶ Mallorquí-Bagué, N. Mestre-Bach, G. & Testa, G. (2023). *Craving in gambling disorder: A systematic review*.

it difficult to limit their gambling have used other self-exclusion tools, and, in the same group, 34 percent have never heard of these. This is unfortunate, as these tools can be very helpful. The Swedish Gambling Authority intends to investigate its own possibilities to provide information on Spelpaus.se regarding relevant tools and to link to websites offering such tools.

4.3.1 Dissemination of knowledge

The Swedish Gambling Authority deems that a need exists for increased knowledge dissemination regarding both Spelpaus.se and other tools for exclusion. The Swedish Gambling Authority, in consultation with the Public Health Agency of Sweden, will identify possible exclusion tools and investigate their suitability for the Swedish gambling market. In the future, this can form the basis for one or more informational campaigns.

4.3.2 Preventing misuse of data in Spelpaus.se

The Swedish Gambling Authority has also received information possibly indicating that unlicensed gambling companies are actively targeting gamblers who have self-excluded on Spelpaus.se. Such marketing appears to occur immediately after the individual has made the decision to self-exclude on the site. Obviously, this constitutes a serious disadvantage for those seeking to stop gambling, and the Swedish Gambling Authority intends to follow this up more closely.

4.3.3 Payment service providers may not transfer payments from persons on the national self-exclusion register to unlicensed gambling operators

In the public debate, critics have accused the national self-exclusion register of "pushing" Swedish gamblers towards unlicensed gambling by forcing excluded gamblers to choose alternatives outside the Swedish licensing system. The national self-exclusion register only includes gambling companies licensed in Sweden, as requiring all gambling companies in the world to join would be legally questionable as well as unrealistic in practice.

An exclusion on Spelpaus.se can only be made if the gambler has chosen to self-exclude. Gamblers cannot rescind the choice to self-exclude. In order to further strengthen consumer protection, and to help those gamblers who have chosen to self-exclude on Spelpaus.se, it could be made possible, for those who wish, for exclusion also to apply to payments to unlicensed gambling companies. However, such an arrangement would require a corresponding obligation on the part of payment service providers to check whether a customer who has self-excluded on Spelpaus.se has also chosen to self-exclude payments to unlicensed gambling companies. In such cases, payment service providers are to block the payment.

The arrangement currently being proposed should be based the choice of the gambler, and should not include an "automatic" exclusion of payments to unlicensed gambling operators upon entry on the national self-exclusion register. Therefore, it is of the utmost importance that information provided on the Spelpaus.se website is clear regarding what self-exclusion involves for gamblers. There may be a risk that the proposed extension may result in some gamblers choosing not to exclude themselves at all. However, this should be weighed against the enhanced protection for those truly seeking to self-exclude under the proposal.

The Swedish Gambling Authority proposes that the Government study the question of whether it is possible to introduce an obligation for payment service providers, when transferring payments to unlicensed gambling companies, to check against the national self-exclusion register whether the customer has chosen to self-exclude and, if so, to block the payment.

4.4 Self-excluding from different forms of gambling

The assignment of the Swedish Gambling Authority also includes studying whether gamblers request the option to self-exclude from specific forms of gambling. Just under half (49%) are in favour of such an option. Online casino games and slots is the form of gambling from which most individuals wish to

self-exclude. This is also the form of gambling which, together with slot machines, is most strongly associated with problem gambling.¹⁷

As shown in the survey, the exclusion of only certain forms of gambling is something that can be extremely difficult for problem gamblers to handle (see quote on page 13). Such an option risks prolonging the path to freedom and control over gambling for problem gamblers.¹⁸ Problem gambling is characterised by an insufficient ability to control gambling and a strong desire to gamble. Individuals who experience this combination will likely continue to be confronted with gambling problems, regardless of whether they self-exclude from a form of gambling they find particularly troublesome, as long as the opportunity to gamble is available. If some forms of gambling can be self-excluded while others remain available, gambling in these forms can be a strategy to ease feelings of emptiness that may arise when access to gambling is restricted.

Nor is exclusion from specific forms of gambling any guarantee that the excluded person will not gamble outside the Swedish licence system, or develop gambling problems due to other forms of gambling that remain accessible. Many reported wanting to self-exclude from online casinos, but the problem of access to the unlicensed market remains, as accessing gambling out Sweden's licensed area is simple. On the other hand, however, many gamblers are positive regarding self-exclusion options for the gambling form they have problems with. Some have also stated that exclusion from a specific form of gambling would entail that new gamblers, who are currently outside Spelpaus.se, would use the register.

Overall, it is difficult to determine what creates the greatest benefit, as these are two groups with conflicting needs. However, the Swedish Gambling Authority deems that protection of vulnerable gamblers would probably deteriorate with introduction of the option to self-exclude from specific forms of gambling. This despite the fact that, for some individuals, such an option could work well.

¹⁷ Public Health Agency of Sweden, *Swelogs, Tabellsammanställning 2021*.

¹⁸ Luquiens A, Vendryes D, Aubin HJ, Benyamina A, Gaiffas S, Bacry E. Description and assessment of trustability of motives for self-exclusion reported by online poker gamblers in a cohort using account-based gambling data.

4.5 Increasing choice of exclusion periods

However, the Swedish Gambling Authority deems the risk of increased gambling problems to be lower when it comes to increasing the choice of exclusion periods. Of those seeking more options, increasing the length of the exclusion was the most common. At present, the maximum self-exclusion period is 12 months at a time. It is therefore possible to offer longer exclusion periods immediately. Lifetime self-exclusion has not been considered a suitable option for reasons of proportionality. As this study shows that many people make their decision to exclude without a lengthy period of consideration, the Swedish Gambling Authority sees no reason to re-evaluate this. For an individual with several previous exclusions, the Authority considers it less likely that a decision is premature. The Authority therefore intends to study the possibility of allowing people with several previous exclusions to extend their exclusion for a shorter period than is currently possible.

Shorter exclusion periods were also requested. Currently, the shortest exclusion period offered is one (1) month. An even shorter exclusion period could be an option for those who are more reluctant self-exclude. The Swedish Gambling Authority intends to study the possibility of shorter periods of exclusion, e.g., around pay days or other critical periods.

Strengths and limitations of data collection

All in all, the Swedish Gambling Authority considers that the two data collections have provided the Authority with a good basis for understanding how and why Spelpaus.se is used. The results show that opinions regarding the website are mixed. In the open responses, several people expressed gratitude for the opportunity to self-exclude from gambling, while others stated that exclusion feels meaningless as it is so easy to circumvent the measure. The diversity of opinion is equally evident when it comes to suggestions for improvement. Proposals range from shutting down the website, because it does not cover all gambling, to extending the system to cover "all" gambling and preferably also gambling loans available on the gambling market. Others state that Spelpaus.se works well as is.

However, it is worth considering the representativeness of the results. It has not been possible to obtain information regarding the response rate in any of the longitudinal components. In Part 1 of data collection, the Swedish Gambling Authority encountered a problem regarding an unknown percentage of individuals who extended a current exclusion prior to data collection and before their exclusion expired. For such individuals, the extension took effect during the data collection period, and they should therefore be counted in the population. However, these individuals have not been offered the opportunity to view or respond to the survey. The Swedish Gambling Authority does not have access to monthly figures showing how many exclusions are extended on average, making it difficult for the Authority to estimate the proportion of individuals offered the opportunity to participate. In Part 2 of data collection, the aim was to reach as many people as possible who have used Spelpaus.se at some point in their lives in order to collect as comprehensive and representative data as possible. The Authority therefore chose to distribute the survey through channels most likely to reach many people who were or had been excluded, including gambling addiction clinics and peer associations. This may have resulted in a higher proportion of people seeking or attending treatment in this study than is the case for the group 'self-excluded on Spelpaus.se' as a whole. It may also have meant that the respondents were not representative of the group of excluded individuals in other ways.