

**Planning, Regulation and Research
Directorate Regulation Department**

Contact: Antypa Aikaterini

Email: a.antypa@gamingcommission.gov.gr

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DECISION

Subject: Procedure for conducting a self-assessment on problematic gambling behaviour

HEAD OF PLANNING, REGULATION AND RESEARCH DIRECTORATE

Whereas:

1. The provisions of:

- a. Article 25 to 54 of Law 4002/2011 amending pension legislation for the Public Sector- Regulations for the development and consolidation of public finances- Responsibilities of the Ministries for Finance, Culture and Tourism and Labour and Social Security (Government Gazette 180/A);
- b. Law 4624/2019 on the protection of Personal Data, measures on the implementation of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and harmonization of Greek Law to Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016, and other provisions (Government Gazette 137/A);
- c. Articles 18 and 19 of Law 4622/2019 on the executive state: organisation, operation and transparency of government, governmental agencies and the central public administration (Government Gazette 133/A);
- d. Chapter XI entitled 'DIGITAL TRANSPARENCY- DIAVGEIA: THE TRANSPARENCY PROGRAM INITIATIVE' of Law 4727/2020 on Digital Governance (Adoption of Directive (EU) 2016/2102 and Directive (EU) 2019/1024 on Electronic Communication (Adoption of Directive (EU) 2018/1972) and other provisions (184/A);
- e. Articles 16 to 23 of Law 3229/2004 on the supervision of private insurance, supervision and control of games of chance and application of the International Accounting Standards and other provisions (38/A), and in a supplementary manner the provisions of Law 3051/2002 on independent authorities enshrined in the constitution and regarding the amendment and completion of the recruitment system in the public sector, and other relevant provisions (Government Gazette 220/A);

2. Joint Ministerial Decision No. 56660/1679/22.12.2011 issued by the Ministers of Finance and Culture and Tourism on the Certification for commencement of operation granted to the Hellenic Gaming Commission (HGC) (Government Gazette 2910/B);
3. Decision No. 145940/ΕΞ 2020/21.12.2020 (Government Gazette, Volume of Special Position Employees and Administration Bodies of the Public Sector and the Broader Public Sector Agencies 1089) issued by the Minister of Finance in conjunction with similar Decisions Nos. 2/63389/0004/21.07.2016 (Government Gazette, Volume of Special Position Employees and Administration Bodies of the Public Sector and the Broader Public Sector Agencies 397), 2/3935/0004/24.07.2018 (Government Gazette, Volume of Special Position Employees and Administration Bodies of the Public Sector and the Broader Public Sector Agencies 428), οικ. 9433 ΕΞ 2019/13.02.2019 (Government Gazette, Volume of Special Position Employees and Administration Bodies of the Public Sector and the Broader Public Sector Agencies 64) and 3557 ΕΞ 2020/14.01.2020 (Government Gazette, Volume of Special Position Employees and Administration Bodies of the Public Sector and the Broader Public Sector Agencies 20) on the commencement of operation of the HGC;
4. HGC Decision No. 218/2/22.9.2016 approving regulation on the organisation, structure and operation of the HGC Service Units (3404/B), as in force;
5. HGC Decision No. 509/2/11.09.2020 transferring responsibilities to the Chairman of the Hellenic Gaming Commission under Article 23 (8) of Law 4141/2013 (81/A), as in force (4139/B);
6. Decision No. 12970/01.12.2020 issued by the HGC Chairman transferring responsibilities to the HGC Service Units' Heads (5651/B) allowing them to exercise relevant duties;
7. Decision No. 79835/ ΕΞ 2020/24.7.2020 on the enactment of the Gaming Regulations for the organization and running of online games of chance (3265/B, Correction of errors 4441/B), and in particular point(d) of Article 8 (8.2);
8. The fact that according to point (d) of Article 8 (8.2) of the aforementioned decision, the License Holder is obliged to publish on his/her website a hyperlink that refers to a self-assessment test for gambling addiction, according to the HGC Instructions;
9. The fact that based on the above facts, there is a need to issue an HGC Directive regarding the process for conducting and determining the self-assessment procedure regarding problematic gambling behaviour based on a scientifically reliable and easy-to-use methodological tool; To this end, in order for participation in gambling to be reasonable and based on prudent and responsible gambling behaviour, the HGC prioritises the Problem Gambling Severity Index (PGSI) with the aim of raising public awareness and so that the players can develop self-protection and self-control skills.
10. The fact that this decision does not entail any burden on the HGC budget.

We hereby decide

To enact a Directive which shall specify both the procedure and content of the self-assessment test, according to point (d) of Article 8 (8.2) of Decision No. 79835 EX 2020 / 24.07.2020 issued by the Minister of Finance, as follows:

DIRECTIVE 2/2021

Subject: Procedure for conducting a self-assessment on problematic gambling behaviour

1. Purpose - Scope

This directive specifies the procedure for conducting and determining the self-assessment method which shall be used to investigate risks associated with problematic gambling behaviour (hereinafter referred to as the "self-assessment test" or "test"), in accordance with Article 8 (8.2) of Decision No. 79835 EX 2020 / 24.07.2020 establishing a Gambling Regulation for the Organization and Conduct of Online Games of Chance issued by the Minister of Finance (3265/B, Correction of Errors 4441/B).

This Directive is addressed to the Online Gaming License Holders who are obliged to comply with its provisions.

The Directive does not restrict License Holders from using other self-assessment tools to investigate the risks associated with problematic gambling behaviour and gambling addiction, provided that these tools are accepted by the international scientific community and widely used in the relevant international practice.

2. Obligations

The Licence Holders shall:

- 2.1. include on their website a special section with information on Responsible Gambling in which the interested party may find, among other things, information about the minimum age limit for participation in the Games of Chance, how participation decisions should be made, what are the Principles of Responsible Gambling, what constitutes problematic gambling behaviour, what are the harmful consequences and risks of overexposure to Games of Chance, and shall also mention the toll-free phone number for the provision of consulting services, etc ..
- 2.2. inform everyone interested that they can provide self-assessment tools (tests) as far as problematic gambling behaviour is concerned and encourage them to assess their own behaviour.

- 2.3. For a self-assessment to be conducted, License Holders shall have available on the website they use to conduct games of chance, a self-assessment test to investigate the risks associated with problematic gambling behaviour and gambling addiction. License Holders shall provide specific instructions to those interested in the methodology used for constructing the relevant index, the way in which one can perform the test, as well as information on the classification of results.
- 2.4. The test shall be available in both Greek and English.
- 2.5. The test shall be anonymous and easily accessible to everyone. License Holders shall ensure that the test can be conducted by anyone interested. For players who hold an Online Player Account, License Holders shall ensure that the test will be carried out only when the aforementioned Players are not logged in to their Account.
- 2.6. Anyone interested can take the test whenever and as many times as they wish.
- 2.7. The test shall be conducted in a fully automated way and the answers given by the interested party shall be processed to the extent strictly required for the production of the results.
- 2.8. License Holders shall allow the interested party to save the test result locally on his/her device, indicating the date and time it was produced.
- 2.9. In the event that, for any reason, the test is not completed, the person concerned should repeat the process from the beginning.
- 2.10. License Holders inform the interested party that they can conduct a self-assessment test on the HGC website and provide the relevant hyperlink.

3. Self-assessment methodology

License Holders shall provide the opportunity to conduct a self-assessment by adopting one or more of the methodologies which are internationally accepted by the scientific community for the detection of risks that may arise from gambling.

Within this context, the "Problem Gambling Severity Index (PGSI)"¹, a widely accepted tool for measuring gambling behaviour, is proposed.

¹ However, the License Holder may also adopt other indicators proposed in the relevant international literature that are considered reliable measurement tools such as the DSM-IV or DSM-V (DSM-V) (Diagnostic and Statistical Manual of Mental Disorders) index created by the American Psychiatric Association (APA).

This index was specifically designed and developed by Ferris and Wynne (2001) with a view to being performed in the general population.

The PGSI index is derived from the answers to a series of questions about experiences and events that may have occurred to the respondent during the previous twelve (12) months as a result of gambling. In order to take the test, the interested party must enter his/her age and gender and is asked to answer the following questions:

In the last twelve (12) months has any of the following happened to you:

1. Were you obliged to borrow money or sell something to get money to play?
2. Have you or your family household ever dealt with financial problems because of gambling?
3. Did you have to cope with health issues including stress or other intense forms of anxiety due to gambling?
4. Do other people criticize you for gambling or tell you that you have a problem with gambling, whether you agree or not?
5. Do you play more than you could really afford to lose?
6. Do you feel that you have a problem with gambling?
7. Do you need to spend more and more money on gambling to be able to feel the same excitement as before?
8. Do you feel guilty about the way you play or about what happens when you play?
9. After playing, do you come back and try to recoup the lost money?

Each individual answer shall be assessed on a four-point scale with the following response categories: "never", "sometimes", "most often", "almost always". The answers shall be graded as follows:

- "Never" = zero (0)
- "Sometimes" = one (1)
- "Most of the time" = two (2)
- "Almost always" = three (3)

The final result of the test shall be the sum of the score the respondent receives from his/her answers to each of the nine (9) questions. Risk categorization based on the involvement in gambling and according to the PGSI index is as follows:

- Responsible gambling behaviour. This category includes those whose answers have a zero-sum and as a result their involvement in gambling does not have any negative consequences.
- Low risk gambling behaviour. This category includes those whose answers have a sum of one (1) to two (2). They are players who suffer the minimum negative effect caused by gambling (indicatively, they rarely run out of time and money or have sometimes felt guilty about having participated in gambling).
- Moderate risk gambling behaviour. This category includes those whose answers have a sum of three (3) to seven (7). They are players who suffer several negative consequences because of gambling (for example, they often increase their time and money limits or sometimes lose their sense of time or experience feelings of guilt about gambling).
- Problematic gambling behaviour. This category includes those whose answers have a sum of eight (8) or more. They are players who suffer a variety of negative consequences caused by gambling and a possible loss of control over the time and money they spend on it (indicatively, they constantly increase their time and money limits, continue to play hoping to win their lost money, experience intense anxiety due to their gambling activities).

Where, according to the result of the self-assessment test, the interested party is classified in the category of moderate-risk gambling behaviour, the result should include a recommendation to reduce the money and time of engagement or abstention from games.

Where, according to the result of the self-assessment test, the interested party is classified in the category of problematic gambling behaviour, the result should include a recommendation to reduce money and time spent on gambling or to be excluded from games and to receive help from independent support services.

In the case of using another indicator, the above are to be applied depending on the categorization of the results and the values received by the individual variables of the respective methodology.

3. Record keeping and reporting

License Holders shall submit a report to the HGC until 31 January of each year for the self-assessment tests conducted on their website in the preceding year. For each test performed, the report shall include the data mentioned in the table below.

TABLE: Report on a self-assessment test to measure problematic gambling behaviour

Report Year _____

Performed tests	Date	Time	Age	Sex	Test Result ²
Serial number (1, 2, 3... ..v)	dd/mm/yyyy	H:M:S			[(0) or (1-2) or (3- 7) or (8+)]

The time stamp (date and time of conducting the test) given to the test by the License Holder's Central Information System is used for verifying the exact time the self-assessment test was conducted. Moreover, the time stamp is given during the production of the final result of the test.

The Head of Directorate

Dimitrios Papadopoulos

² In case of using another index, test results shall be presented based on the categorization of the results and the values of the individual variables used as part of the respective methodology.