



Slots to consider

As the UKGC opens up its consultation on online slots, EGR Intel finds out how a ban on auto-play, turbo buttons and reverse withdrawals could affect the playing experience

Words by | **Melanie Dayasena-Lowe**

Regulatory scrutiny of the UK online gambling sector seems to have been the order of the day lately. In just a matter of weeks, the industry has been hit with a report from The Gambling Related Harm All Party Parliamentary Group calling for an end to in-play sports betting while a House of Lords report proposes to ban gambling sponsorships in sport.

The latest area to come under the spotlight is online slots as the Gambling Commission (UKGC) announced last month that it had opened up a consulta-

tion on the design of slots games to make them safer for consumers.

The consultation, which opened on 9 July and closes on 3 September, aims to build on the previous efforts of an industry working group on safer game design. The group, led by Scientific Games and Playtech, was appointed in January to join forces with the Betting and Gaming Council to work on drawing up a draft code of conduct.

While the UKGC did acknowledge that the industry's suggestions would make online slots games immediately safer, it

did not consider the measures by themselves to be sufficient.

Suppliers such as Relax Gaming are keen to provide their input to the consultation and urge their peers to do the same. "Relax Gaming intends to supply its views in the open consultation – it's an important part of the regulatory process and the more stakeholders participate, the more comprehensive the gathered information will be," explains Alexia Smilovic, chief regulatory officer (CRO). "Jurisdictions rarely ask their licensees' opinions prior to shaping the requirements, so this opportunity should not be missed."

Smilovic also welcomes the UKGC's initiative to support the work initially carried out by the BGC group by considering the industry's input before adopting extra measures. "Valuable feedback on issues pertaining to player protection,

especially from lesser-known suppliers, emerges from wider inclusions on these discussions," she adds.

Push Gaming CEO James Marshall is also keen to submit feedback and appreciates the UKGC reaching out to the industry for its views. "The opportunity to work with the UKGC, or at least have an opinion on proposed technical changes, is a great step forward for us to work together to build trust in this industry."

As part of the consultation, the UKGC has proposed a suite of new controls aimed at reducing the potential for consumers to be harmed by their gambling on the most intensive products (online slots) as well as removing the ability for operators to reverse customer withdrawal requests.

The proposed suite of enhanced controls will be incorporated within the remote gambling and software technical standards (RTS), which sets out the specific technical standards that licensed operators and software suppliers need to meet.

Time to define

As there is currently no separate licence for remote slots, which fall under casino, the UKGC proposes to define online slots within the RTS. The proposed new definition would be: slots, definition: casino games of a reel-based type (includes games that have non-traditional reels). Licensees will be responsible for informing the test house if the game is a slots title when they submit it for testing. Any attempts to design or redesign slot products to circumvent the definition may be considered a breach of RTS.

Push Gaming's Marshall believes it could have a negative impact on game design and he feels perhaps the focus has been misplaced. "I feel there is a risk of focusing on the way games are designed, rather than focusing on data and picking up on potential problem gamblers. The games must be fair and rules must be clear, but we have existing technical requirements and testing to ensure this is the case," he explains.

On this point, Relax Gaming's CRO believes the tighter definition will affect many aspects of game design production, which has been seen in other jurisdictions where more detailed definitions

of casino games and variants have been incorporated into regulation. "This has limited the creativity on classic supplier practices such as devising hybrid concepts or creating new representations of classic games. In this sense, any supplier operating across several European regulated markets already assimilated parts of that challenge.

"The proposed UK product design requirements, combined with this tighter definition, is taking things a step further, as it will control the games proposed to UK players in an attempt to limit unwanted behaviours rather than simply classifying their eligibility to licensed operation," she explains.

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■ James Marshall, Push Gaming

Single play

The UKGC is proposing an update to RTS, which will require operators to ensure consumers are only permitted to play one slot game at a time per account across multiple tabs/windows, browsers, apps or devices.

As Relax Gaming's CRO explains, the objective is to ensure players are aware of their actions when engaging in gambling activity, encouraging them to maintain their awareness, plus keep track of time and spending. "Such measures aim to avoid passive behaviours where players end up being spectators of the games they are playing," Smilovic remarks.

Further to that, another aspect attempting to be controlled is to reduce the level of intensity generated by gambling on multiple slot games simultaneously. "The ratio of spending to the duration of time will decrease significantly when one game is played at a time, therefore allowing for more focus and awareness. In this way, the 'increased spending' control objective can be met along with the 'experience intensity' reduction objective," she adds.

Even with these measures in place, Smilovic questions whether the average player will instead simply dedicate a longer time period to gambling or activate multiple accounts to be able to play multiple games across devices.

Spin speed

Another aspect of the UKGC's consultation is looking at the speed of play as research on the key issues in product-based harm minimisation, prepared for The Responsible Gambling Trust in 2016, indicated that faster game cycle speed is associated with increased risks to the consumer.

The UKGC is proposing to introduce a minimum spin speed for online slots, which will mirror category B3 (mostly slots) gaming machines at a minimum of 2.5 seconds. The consultation also looks into the prohibition of in-game features that contribute to a greater intensity of gameplay such as turbo or boost buttons and any feature that gives the illusion of control such as player-led spin or reel-stop features.

Paul Caruana Turner, legal and compliance manager for Nolimit City, agrees with the fact that there is scope for a revision of certain aspects of slots game design, but clarifies that he doesn't support all of the proposals.

"The banning of spin-stop or quick-spin features is a decision which I can get behind. In my humble opinion, such features are not only potentially harmful to players but can also diminish the entertainment value of slot games. This proposed standard will be supplemented by the introduction of a minimum game cycle of 2.5 seconds, shorter than the likes of Sweden or Denmark and what is being proposed in Germany," he explains.

Auto-play on the scrap heap?

Auto-play is another feature that is under scrutiny and is cited as a potential factor to gambling-related harms because it removes an element of decision-making and time to reflect on the outcome.

The proposal to remove the auto-play facility has caused quite a stir among the slots community, with most questioning its effectiveness in reducing gambling-related harm.



Alexia Smilovic at Relax Gaming is not convinced that removing auto-play will achieve the desired level of protection

While Caruana Turner at Nolimit City supports the introduction of a minimum game cycle for player protection, he believes the proposed wording for RTS 14 needs to be revised as the current phrasing would result in a ban on auto-play functions.

“I disagree with such a proposal especially when one considers this proposal collectively with the other proposals being put forward by the Commission. The auto-play function tends to be a popular feature among players and removing it entirely could diminish the attractiveness of games offered by licensed operators when compared with those of unlicensed operators,” he remarks.

In turn, he says it risks driving players towards unregulated markets where player protections are often completely absent or significantly reduced, bringing about unintended consequences.

Smilovic at Relax Gaming is not convinced that removing auto-play will achieve the desired level of protection, despite the indications showing its contribution to players’ disassociation from gambling activities. “The UK’s auto-play function was already quite well structured to avoid players’ passive spending. With a maximum amount locked to 100 spins and a mandatory loss limit to be

set before being able to activate it, the auto-play function is just a way for players to let the game run its course without attending to every spin,” she comments.

Reverse withdrawal

The UKGC has also put forward a proposal to prohibit reverse withdrawals which allow customers to change their mind about withdrawing funds from their account before the transfer has completed.

Relax Gaming’s CRO believes this change will help to ensure players don’t make hasty decisions. “It’s normal for a player to withdraw their prize money only to suddenly turn back and re-gamble that sum, that’s when forbidding withdrawal requests reversal comes into play and can really help players to stay in control and make better decisions.”

Overall, some of the changes proposed in the consultation will ultimately affect the playing experience in different ways. Marshall points out that removing the auto-spin function would likely create a negative experience for players. “Given its popularity, it has become almost integral to the game experience for many, so I see this as likely being negatively received as it will mean players will have to revert back to older, less-enjoyed ways of playing slots.”

In turn, Smilovic thinks those players that are seeking a high-intensity, thrilling gambling experience will instead be faced with a much slower-paced environment. “Similarly, players seeking relaxation in their gambling activity may not find the same sense of escapism, as the new requirements will keep them alert and conscious of their actions during their playing time.” But she does acknowledge that it will help players who are susceptible to developing unhealthy habits or behaviours.

A real worry for the online slots sector is whether these proposals could harm the vertical’s growth prospects in the future. For Marshall, that is a huge concern. “For example, think of its effect on general innovation – how does a slower bet-to-result time affect other forms of games? What does this mean for innovation – like adding skill-based elements?

“We also need to take into account how much turnover is required in a game. Games run at between 92%-97% RTP, which means players need to play plenty of rounds in order for the games to make money. Slowing the spin time, while negligible at only 2.5 seconds, still risks making the experience sluggish, and in turn, reducing retention rates and the vertical’s growth,” he comments.

For Smilovic, it’s hard to say what the impact might be but she does point out that the proposed restrictions could intrinsically reduce the spending of an important portion of the UK market when looking at the periodic ratio (hours, days, weeks, months). “The result will likely show a negative impact on the casino segment growth, especially when taking the UK market’s valuable position in the European landscape,” she says.

Looking ahead, Marshall believes the online slots consultation is a step in the right direction and an opportunity for suppliers to work more closely with the regulator to improve player trust and the public’s perception of gambling.

While it appears a deeper regulatory overhaul is unavoidable, the slots community is hopeful that good and effective proposals will come out of the consultation and that it will be a chance for the industry to improve and show a willingness to be part of that journey alongside the regulator. ●