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Blocking illegal online gambling in a deregulated market

Experiences from Denmark

Troels G. Hansen
Senior Manager
Deloitte Denmark

BALL

X
-
X
X

MONDAY LEAGUE -
WEDNESDAY -
PLAYER STATS X
FRIDAY LEAGUE X

```
## Skin Window Message Procedure  
def SkinWindowProc(str):  
    operator = string.split(str.value, "/")  
    ## pressed off  
    if operator[0] == "btn_close":  
        HelloWorld.SendSkinMessage("wndmar" "cls", "hello")  
        HelloWorld.FinalSkin()  
        EndPumpMessage()  
    pass
```

MONDAY LEAGUE	3-2	LIVE	90%	Progress bar
WEDNESDAY	3-2	LIVE	90%	Progress bar
PLAYER STATS	3-2	LIVE	90%	Progress bar
FRIDAY LEAGUE	3-2	LIVE	90%	Progress bar
TEAM A V TEAM B	3-2	LIVE	90%	Progress bar
MONDAY LEAGUE	3-2	LIVE	90%	Progress bar
WEDNESDAY	3-2	LIVE	90%	Progress bar
PLAYER STATS	3-2	LIVE	90%	Progress bar
FRIDAY LEAGUE	3-2	LIVE	90%	Progress bar
TEAM A V TEAM B	3-2	LIVE	90%	Progress bar



Experiences from Denmark

Topics

- The Danish Gambling Model
- Defining and detecting illegal online gambling operators
- Tools for blocking illegal online gambling operators
- Advertising ban, internet-blocking and payment blocking
- Advantages and disadvantages of the Danish Model



Experiences from Denmark

Troels G. Hansen



Profile

Senior Manager from Deloitte Denmark with 10 years of experience in IT projects
Subject Matter Expert on gambling

Gambling experience

Deregulation of the Danish gambling market (2010-2013)

Technical Project Manager from 2010 to 2013 for the Danish Gambling Authority through the entire process of deregulating the Danish online gambling market in 2012.

Improving gambling control system for regulated market (2013-2014)

Technical Project Manager from 2013 to 2014 on improving the Danish Gambling Authority's gambling control system on the regulated market for online and off-line gambling.

Compliance expert with Danske Spil (2016)

Compliance expert in 2016 on projects with Danske Spil, the largest gambling provider in Denmark.

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The Danish Gambling Act

- To keep the use of gambling services at a moderate level
- To protect young people or other vulnerable people from being exploited through gambling or developing gambling addiction
- To protect players by ensuring that gambling is provided in a fair, responsible and transparent manner
- To ensure public order and to prevent gambling from reinforcing criminal activities

The model is considered successful with a large number of licence holders, and an estimated small amount of illegal gambling.

Many licence holders contribute to a competitive gambling market with little incentive for gamblers to use illegal sites.

Licence type	Licence Holders
Online Casino	25
Online Casino (revenue restricted)	7
Betting	16
Betting (revenue restricted)	3

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Defining illegal online gambling operators



A gambling activity is provided illegally if:

- the gambling activity is provided **without the required licence** from the Danish Gambling Authority and
- the gambling provider **directs marketing towards Danish gamblers**



A gambling activity provided through the Internet, is seen to be provided in Denmark if:

- the homepage is in **Danish**, or
- a Danish **currency** can be chosen, or
- the homepage has a **Danish customer service**, or
- **payment methods** can be used which would normally only work in Denmark, like e.g. Dankort, or
- the operator of the homepage **directs marketing** towards Denmark.

Note – this definition means that other EU sites providing gambling services in local languages etc are not illegal according to The Danish Gambling Act.

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Detecting illegal online gambling operators

The Danish Gambling Authority has two channels to detect illegal online gambling operators:



Reporting from users



Regularly monitoring of the gambling market



Monitoring of the gambling market is done several times a year using a **crawler*** setup for specific keywords, such as **bingo, betting and poker**.



If the hits do not target the Danish market they are whitelisted, otherwise they are **investigated further** in accordance to current legislation.

* Web crawling is done using the Dutch developed Xenon.

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Tools for blocking illegal online gambling operators

In order to protect the regulated gambling market and to protect the players, the Danish Gambling Act provides these tools:



**Advertising
ban**



Internet-blocking



Payment-blocking

Blocked internet sites

www.1bet2bet.com
www.7red.com
www.7red.dk
www.alljackpotscasino.com
www.allslotscasino.com
www.amazingvideopoker.com
www.casinodelrio.com
www.casinomel.com
www.casinotropez.com
www.coolhandpoker.com
www.delrio-casino.com
www.deuropacasino.com
www.magamoneygames.com
www.quasargaming.com
www.titancasino.com
www.titancasino.dk
www.trillionario.com
www.winner.com
www.wintrillions.com

Blocked internet sites: A standard message is shown.



There is no public blacklist officially available from The Gambling Authority. However, the telecom industry's trade cooperation maintains a public list of blocked sites.

Ekskluzywny 30€ DARMOWE

+ 200% aż do 350€

ZAREJESTRUJ SIĘ TERAZ

[Warunki](#)



1 Zarejestruj się
Szybkie i łatwe

2 Zdeponować
Odbierz swoją ekskluzywny bonus

3 GRAJ
Pobieranie nie jest wymagane



PLAY ROULETTE
200% UP

PLAY SLOTS
200% UP

PLAY VEGAS
250%

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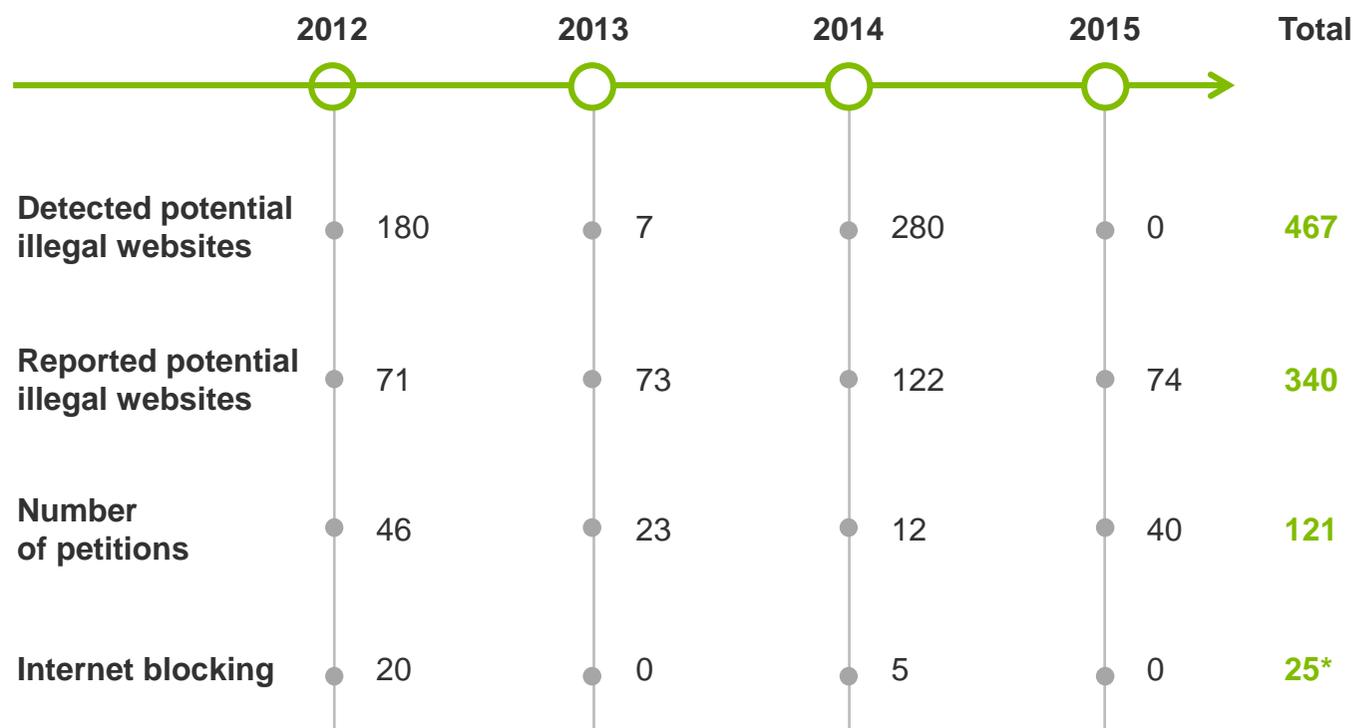
Number of blocked gambling operators

The operators of the gambling activities that The Danish Gambling Authority assesses illegal, are initially given a petition from The Danish Gambling Authority, requesting them to terminate the illegal provision of games.

If they do not comply, the enforcement, however, will not be addressed directly against the illegal gambling operators, but rather against the Danish ISPs, banks and media.

The authorities will force these parties to block the Danes access to illegal gambling.

Potential illegal websites, petitions and internet blockings



* Of the 25 blocked websites, 12 have decided to follow the petition why the blocking has been removed. The remaining 13 are still blocked.

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Internet-blocking

SOLUTIONS



Enforcement to block the homepage with illegal gambling, is addressed against the **Danish ISPs**.



The Danish Gambling Authority has a good dialogue with the ISPs, however;



The majority of ISPs will typically first block the homepage when there is a **ruling from the Bailif's court**.



Therefore, The Danish Gambling Authority often takes the matter to the Bailif's court in order to have the **homepage blocked using DNS blocking**.

CHALLENGES OF INTERNET BLOCKING



DNS-blocking can **easily be surpassed** by the user



It is **not illegal** to surpass the DNS-block and thus visit the illegal gambling website

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Payment-blocking

SOLUTIONS



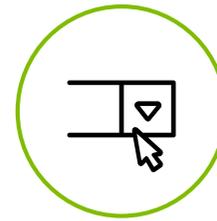
Danish payment institutions are required to **block access to transfer money** to/from illegal gambling operators

CHALLENGES OF PAYMENT BLOCKING

Easy to surpass, as;



It is practically impossible to force **foreign banks** to block transactions



The same challenge applies for international transaction services such as **PayPal**



It is also impossible to block transactions **from Danish banks to foreign banks** or international transaction services

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Advertising ban

SOLUTIONS



All advertising of gambling activities and gambling providers without a license **forbidden.**



Media advertising for gambling operators without a license, gets a **petition** from The Danish Gambling Authority to stop the illegal advertising.



If the media does not cease the illegal advertising, they will be **reported to the police.**

Experiences from Denmark

Advantages and disadvantages of the Danish Model



ADVANTAGES

- Pragmatic approach that has created a competitive and attractive gambling market for operators and gamblers
- Complies with EU legislation, because the enforcement is done towards Danish ISPs, banks and media



DISADVANTAGES

- Does not block the illegal gambling operators, only access to them
- Internet-block and payment-block is easy to surpass for users
- Criminalises ISPs and Banks, even though they are not the operator of the illegal gambling



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