STATE OF PLAY 2017:
A REVIEW OF GAMBLING
IN FINLAND

Johanna Järvinen-Tassopoulos (ed.)
STATE OF PLAY 2017:
A REVIEW OF GAMBLING IN FINLAND

Johanna Järvinen-Tassopoulos (ed.)
FOREWORD

State of play 2017: A review of gambling in Finland describes the Finnish gambling system and policy and the social and individual level phenomena related to them. The review introduces the readers to the facts behind gambling policy decisions and gives an overview of the authorities’ tasks and the state of play in Finnish gambling between these covers. This publication, which follows on the Yearbook of gambling most recently published in 2013, will serve as a basic information source on gambling in Finland.

A historic change in the gambling system
The Finnish gambling system is based on monopoly regulated by law. In 2017, the gambling activities of three operators with monopoly, or Fintoto Oy, Finland’s Slot Machine Association and Veikkaus Oy, were merged to form Veikkaus Oy, a single, fully state-owned company. This work discusses in detail the fundamental changes having taken place in the operating environment of the gambling sector and the reasons that led to the decision to merge the gambling operators.

Within the European frame of reference, preserving and strengthening the monopoly system by a decision to merge the three operators stands out among the fundamental gambling policy solutions chosen by other countries. Sweden, for example, is about to open up its gambling system based on monopoly to competition under a bill that will likely be submitted to the Parliament in spring 2018. In Finland, there has been a political consensus on preserving the monopoly system, and population surveys indicate that the citizens also lend their strong support to a monopoly system based on preventing gambling-related harms.

The objective of the Finnish gambling policy is preventing and reducing the harms that gambling causes to society and individuals. A model based on a single operator with monopoly affords a good starting point for achieving these objectives. The new Veikkaus Oy has a statutory duty to operate responsible gambling, and such tools as setting up a universal gaming account for each gambler allow gamblers to get a better grasp of their playing. This also enables Veikkaus Oy to monitor gambling problems more efficiently and target responsible gambling measures at those who need them.

The authorities must continue to ensure that gambling is strictly and consistently regulated and supervised, the gambling policy objectives are reached, and the monopoly system meets the criteria set by the Court of Justice of the European Union for maintaining it. Following the change in the gambling system, supervision was intensified in 2017.
Lotteries Act provisions also apply to online gambling operation and its marketing

No gambling licence to cover all EU Member States has been introduced in Europe. Each Member States is free to define its national gambling policy and the level of protection it aims for, and thus also restrict the offer of gambling services. In practice, the gambling operator must apply for a licence in all states where it wishes to offer its games, either at physical outlets or online. Similarly, gambling operators must refrain from offering games in the states where they do not have an operating licence.

Similarly to many other sectors, gambling increasingly takes place online, and new forms of marketing are continuously adopted in addition to traditional advertising. In terms of marketing supervision, this development means that supervision and the associated investigations increasingly target online marketing.

The marketing practices of foreign gambling companies have also developed in recent years in keeping with general technological advancement and social media trends. It is thus easier than ever for foreign actors to produce marketing communications targeted at Finland. The significance of social media opinion leaders, in particular, has increased in marketing.

Actions underpinned by information

A gambling-related population survey is conducted every four years in Finland to monitor trends in gambling and, above all, at-risk and problem gambling. The population survey data is complemented with data obtained from the service system and other studies. In addition, such aspects as the effectiveness of treatment methods are studied. Efficient prevention and treatment of gambling harms are underpinned by information about the current situation and methods by which it can be influenced. A working group set up by the Ministry of Social Affairs and Health to evaluate harms related to gambling products anticipates risks of harms associated with games and thus plays a key part of Finland’s new gambling system.

In addition to gathering information on the prevention of gambling-related harms and treatment methods, attention needs to be focused on structures. The prevention of gambling harms was included in the Act on Organising Alcohol, Tobacco, Drugs and Gambling Prevention (523/2015) in 2015. The current health and social services reform will affect access to and the availability of services for clients seeking support and treatment for gambling problems, in this context especially mental health and substance abuse services. Some of the services are specifically targeted at gambling problems, and they are often offered by NGOs or various actors in cooperation. By developing online services, the needs of an increasing number of clients can be met, whenever and wherever they are. Developing the keeping of statistics and records on client work and thus making it visible is a major challenge across the service system.

The authors are officials in charge of drafting gambling policy, supervising gambling operation and addressing gambling harms.
The Ministry of the Interior is responsible for drafting gambling policies and their steering, as well as the drafting of statutes relevant to the policies and steering. Within the Ministry’s administrative branch, the National Police Board is in charge of supervising lotteries at the national level and for compiling statistics on them. The prevention of gambling-related harms, on the other hand, is within the Ministry of Social Affairs and Health’s remit. The Ministry of Social Affairs and Health monitors and studies gambling problems and develops their prevention and treatment through the National Institute for Health and Welfare. All these stakeholders contributed to producing this book.

The authors would like to dedicate this book to the memory of Antti Murto, M. Sc. Pol., a Ministry of Social Affairs and Health expert, who passed away following a serious illness in May 2017. Antti Murto will be sorely missed by everyone in the Finnish gambling sector. Not being limited to issues of gambling harms and treatment, his expertise extended to everything from examining individual gambling products or phenomena to assessing the societal impacts of gambling. Despite his serious illness, Antti Murto kept working actively until the end and was also one of the authors of this book. In addition to appreciating his expertise, Antti Murto’s colleagues will miss him and remember him above all as a friendly, encouraging and selfless person who, despite his short life, influenced and left his mark on the work on gambling harms and gambling regulation.

Helsinki, 14 December 2017

JARI KEINÄNEN
Director
Department for Wellbeing and Services
Unit for Clients and Operating Environment
Ministry of Social Affairs and Health

KATRIINA LAITINEN
Director of Legislative Affairs
Police Department
Legislative Affairs
Ministry of the Interior

SAINI MUSTALAMPI
Chief Specialist
Department of Public Health Solutions
Alcohol, Drugs and Addictions Unit
National Institute for Health and Welfare

SAARAMIA VARVIO
Chief of Gambling Administration
Gambling Administration
National Police Board
ABSTRACT

JOHANNA JÄRVINEN-TASSOPOULOS (ed.)
State of play 2017: A review of gambling in Finland
Helsinki: National Institute for Health and Welfare

In early 2017, Fintoto Oy, Veikkaus Oy and Finland’s Slot Machine Association were merged to form Veikkaus Oy, a new, fully state-owned company. Under the updated Lotteries Act, Veikkaus Oy has the monopoly to operate gambling services in Finland. The purpose of the Lotteries Act is preventing and reducing the financial, social and health-related harms caused by gambling. Finland finds a monopoly system the most effective way of achieving its gambling policy objectives. As a European Union Member State, Finland must strive to achieve these objectives by setting restrictions to gambling operation (including consumer protection, prevention of problem gambling and protection of minors).

Oversight of gambling operation and its marketing in mainland Finland as well as supervision of and interventions in illegal gambling operation and its marketing play a key role in the Finnish monopoly system. The marketing of gambling products is regulated under the general provisions of the Consumer Protection Act and special provisions on marketing in the Lotteries Act. In terms of supervision, Finland differs from the other Nordic countries in that a computerised system is used, enabling the real-time supervision of gambling activities. International cooperation is part of the extensive and effective supervision of gambling operation.

The prevalence of gambling has increased in Finland between 2007 and 2015. The results of the Finnish gambling survey from 2015 indicate that 80% of the respondents had gambled in the previous year. Men typically gambled once a week, whereas women gambled less often than once a month. One half of the population survey respondents had a positive attitude towards gambling. In 2015, Finnish people spent EUR 1,329 million on gambling. On average, each gambler spent EUR 494.02 on gambling a year. Men accounted for 75% of the total gambling expenditure in Finland. Low-income gamblers spent clearly more than others on gambling in proportion to their income.

In the Court of Justice of the European Union’s case-law, spending gambling profits on purposes of public interest may only be an incidental beneficial consequence of a gambling system based on monopoly. The Lotteries Act reform in early 2017 changed the allocation of gambling proceeds and the procedures associated with it. In 2016, the total profits of the three gambling organisations were EUR 1,031.8 million, and this sum was entered as revenue in the state budget to be used as aid granted to beneficiaries and for other purposes. It is estimated that the amount spent on games offered by operators outside the country (including PAF) was EUR 170 million in 2016. This corresponds to 8.7% of the gross gambling revenue.
The results of the population survey carried out in 2015 indicate that 3.3% of the respondents had a gambling problem. Almost one respondent out of five had a family member or a friend with a gambling problem. The harms experienced by gamblers were associated with spending more money than they had originally intended, returning to gambling in order to win back the money they had lost, and feeling guilty about their gambling. The highest amount of gambling-related harms were experienced when the significant other who gambled was the respondent’s child or partner.

According to the results of the Gambling Harms Survey conducted in 2017, the lives of 11% of the respondents had been affected by gambling harms; the clients of the Gambling Clinic had experienced a great number of different gambling harms.

The principal objectives of the Finnish gambling policy are preventing and reducing gambling harms. The prevention of gambling harms refers to all measures taken to prevent and reduce the harms that gambling causes to individuals, persons close to a gambler and society. The risks can be reduced considerably by influencing the gambling environment and the properties and sales of games, as well as by linking different tools players can use to control their gambling to the games. Under the amended Lotteries Act that entered into force at the beginning of 2017, Veikkaus Oy shall, when operating gambling activities, undertake to prevent and reduce the financial, social and health harms caused by gambling.

Gambling disorder is a behavioural addiction. It frequently occurs simultaneously with other associated symptoms. Access to support, information and counselling has been improved considerably in Finland in the last ten years. The offer of specialised services for treating gambling problems remains rather scattered in Finland. In recent years, treatment methods for gambling disorder have been studied and developed, and professionals’ competence has been built up. Local support and coordination aiming to strengthen competence related to gambling problems have also been developed. From the perspective of the prevention and treatment of gambling problems, the reform of health and social services will both create opportunities for and set challenges to developing the services. As a result of the reform, the prevention of gambling-related harms will be united with preventive substance abuse work and its organisation as one of the health and welfare tasks assigned to the municipalities and counties.

Keywords:
MONOPOLY SYSTEM
GAMBLING POLICY
GAMBLING
GAMBLING HARMs
PREVENTION
CONTENTS

FOREWORD 4

ABSTRACT 7

INTRODUCTION 12

CHAPTER 1. The transition of the Finnish gambling system 18

1.1 New departures in gambling policy based on monopoly
   – transition to a single monopoly company model 19
1.2 The reformed Lotteries Act 20
1.3 Actors in the Finnish gambling system 21

CHAPTER 2. Gambling policy and its implementation 24

2.1 Basic gambling policy outlines 25
2.2 Steering of gambling operation 25
2.3 Restrictions on gambling operation 26

CHAPTER 3. The international operating environment of gambling 28

3.1 Restrictions on gambling in the European Union 29
3.2 European Commission actions 29

CHAPTER 4. Basic principles of gambling supervision 31

4.1 Purpose of supervision 32
   4.1.1 Entry of new games into the market 33
   4.1.2 Permitted forms of gambling activities 34
4.2 Supervisory organisation 34
   4.2.1 International stakeholder cooperation 35
CHAPTER 5. Purpose of supervision: ensuring legal protection and preventing abuses and crimes

5.1 Ensuring consumers’ legal protection

5.1.1 Official supervisors

5.1.2 Recommended decisions

5.1.3 Statements

5.2 Prevention of abuses and offences

5.2.1 Intervention in gambling activities breaching the Lotteries Act

5.2.2 Prevention of money laundering and the financing of terrorism

5.3 Computerised supervision

5.3.1 Supervisors’ access to game event data

5.3.2 Use of game event data in supervision

5.3.3 Requirements concerning the transfer of game event data for supervisory purposes

5.3.4 Changes in official supervision brought about by the advancement of information technology

CHAPTER 6. Marketing

6.1 Marketing of gambling services in Finland

6.2 Cross-border marketing

CHAPTER 7. Prevalence of gambling

7.1 The prevalence of gambling is high in Finland

7.2 Onset age of gambling

7.3 Past-year gambling frequency

7.4 Popularity of different game types

7.5 Online gambling

7.6 Population’s attitudes towards gambling

CHAPTER 8. Gambling expenditure

8.1 How much money is spent on gambling?

8.2 Who spends money on gambling?

CHAPTER 9. Gambling proceeds

9.1 Gross gambling revenue

9.2 Gambling profits

9.3 Use and distribution of gambling proceeds

9.3.1 Ministry of Education and Culture grants

9.3.2 Ministry of Social Affairs and Health grants

9.3.3 Reform of the Lotteries Act and the undivided funds of Finland’s Slot Machine Association

9.3.4 Ministry of Agriculture and Forestry grants

9.4 Expenditure on gambling abroad
CHAPTER 10. Gambling-related problems and harms

10.1 Prevalence of gambling problems in Finland........................................................................... 76
10.2 Gambling problems of significant others ................................................................................. 78
10.3 Gambling-related harms to gamblers and their significant others ........................................ 78
   10.3.1 Gamblers .......................................................................................................................... 78
   10.3.2 Significant others ............................................................................................................. 80
10.4 Gambling harms affecting society .......................................................................................... 82

CHAPTER 11. Prevention of gambling harms

11.1 What do prevention and reduction of gambling harms mean? ................................................. 86
11.2 Evaluation of harms ................................................................................................................ 87
11.3 Responsible gambling and its effectiveness ......................................................................... 88
11.4 Integrating the prevention of gambling harms in preventive substance abuse work ............ 91
11.5 Information, training programmes and communications supporting the prevention of gambling harms ............................................................................................................. 92

CHAPTER 12. An overview of support, counselling and treatment services

12.1 Gambling disorder and challenges to seeking help or treatment ................................................ 96
12.2 Support, information and counselling services ..................................................................... 97
12.3 Outpatient and inpatient treatment services ......................................................................... 101
   12.3.1 Outpatient services ........................................................................................................ 101
   12.3.2 Inpatient rehabilitation ................................................................................................. 104
   12.3.3 Methods for supporting significant others ..................................................................... 106
   12.3.4 Services for children and young people ................................................................. 106
12.4 Building up the competence of professionals ...................................................................... 107
12.5 Prevention and treatment of gambling problems in the health and social services reform ................................................................. 108

CONCLUSION

INTRODUCTION TO THE AUTHORS
INTRODUCTION

In the international context, gambling is considered a public health issue, and its prevalence is studied regularly by means of population surveys in Finland [1]. The surveys additionally provide information on the prevalence of problem gambling and, for example, the population groups in which at-risk gambling and problem gambling have increased and the modes of gambling among vulnerable groups (including young people and ethnic minorities) [2].

What societal impacts does gambling have?

Less attention has been paid to the societal impacts of gambling and the harms and costs it can cause to society. In Finland, as societal harms and burdens caused by gambling have been identified a need for health and social welfare services (including treatment and support services, social assistance) and other factors causing costs, including employees’ reduced work ability, credit services and debt arrangements associated with gambling, as well as crime [3]. Previously, the negative health-related and social impacts of gambling have been examined especially from the perspective of problem gambling (the prevalence of problem gambling and comorbidities), economic problems and public finance expenditure) [4].

Societal impacts refer to social and economic changes over a certain time period caused by gambling and gambling operation in society. These impacts are not intrinsically positive or negative, and they are not used to gauge benefits and disadvantages or calculate costs. When analysing societal impacts, we must consider how a social or economic change is manifested at population level, what type of gambling is involved, and what the special features of the relevant jurisdiction (including a federal state, a state or some other administrative area) and period under scrutiny are [5].

This review of gambling in Finland focuses on the gambling system as it was in 2017. The review also looks back on earlier processes and projects that led to the merger of the gambling organisations’ operation and the Lotteries Act reform. Evidence-based information about gambling in Finland, gambling expenditure as well as at-risk and problem gambling gives indications of population-level changes and justifies the actions taken to prevent and reduce gambling harms in Finland. This review discusses at a general level the impacts of gambling and gambling operation on society that are deemed social or economic.
Examples of social impacts

The social impacts of gambling and gambling operation can be examined at the level of legislation, citizens’ attitudes and society’s values, public health and welfare, and the regional features of gambling operation. Basing the gambling system on monopoly has been found important in Finnish society, and the monopoly system to a great extent also has the citizens’ approval (Chapter 1). The monopoly system and gambling policy aim to prevent and reduce the harms caused by gambling and combat the organisation of fraudulent gambling operation and crime associated with gambling (Chapter 2). Legislation can also help prevent the offer of games by foreign operators in breach of the Lotteries Act (HE 132/2016) (Chapters 3, 4 and 6).

Finnish people’s views of gambling problems have been studied since the first population survey on gambling in Finland was carried out in 2003. In the subsequent years, questions concerning the monopoly system, the age limit of 18 years, attitudes towards gambling, the advertising of games, and responsibilities for preventing problem gambling have been added to the questionnaire [6,7,1]. While an attempt to gauge changes in societal values can be made by interpreting citizens’ attitudes and opinions, the most accurate reflection of the prevailing values can be seen in the permissibility related to gambling operation, such as the age limits (Chapters 2 and 4), the accessibility of gambling, and marketing (Chapter 6). A change in societal values is also indicated by the fact that while more and more information about the gambling-related risks is available, gambling has gradually become an acceptable leisure activity.

At the population level, gambling operation has impacts related to both public health and social policy (Chapter 11). While the majority of the population escapes gambling-related harms completely, some gamblers may experience very serious harms (Chapter 7). Most gambling harms also affect others besides problem gamblers themselves (Chapter 10). For example, problem gambling is associated with mental and other health problems, problems in relationships, and financial problems. Problem gambling may also be associated with the possibility of creating an intergenerational model of excessive gambling [2]. Poverty indicators, including a low income (Chapter 8), unemployment, poor state of health, poor housing conditions and a low educational level correlate with problem gambling [2]. Problem gambling increases social inequalities between citizens.

Decentralisation of outlets and the sales figures of games give indications of the regional social impacts of gambling operation. Provisions on the operation of Veikkaus Oy’s games are laid down in Government Decree (1414/2016). At maximum 18,600 slot machines and special machines may be kept available in gaming outlets, whereas in dedicated game arcades, at maximum 3,900 slot machines and special machines may be provided. The maximum number of designated arcades is 120. In these arcades as well as in restaurants and bars, at maximum 500 casino games and other similar games may be provided (Decree 1414/2016). One casino operates in Helsinki, while another one is to be opened in Tampere. At most 800 slot machines and special machines may be provided in casinos, in addition to a maximum of 120 casino games or other similar games (Decree 1414/2016). In addition to these games, Finnish gamblers can play Veikkaus Oy’s games online (Chapter 7).
Examples of economic impacts

The Lotteries Act contains provisions on the use of gambling proceeds. Rather than being merely limited to gambling proceeds or lottery tax revenue, the economic impacts of gambling activities at societal level can also be examined from the perspective of public interest purposes, tourism and leisure time, as well as services and structures that enable society’s operation (infrastructure).

Finnish society benefits from the gambling proceeds and lottery tax revenue in many ways (Chapter 9). Gambling proceeds are spent on purposes of public interest in Finland (HE 132/2016). Proceeds are used to promote sports, physical education, science, the arts and youth work. In addition, they are used to promote health and social welfare as well as horse breeding and equestrian sports. The lottery tax revenue contributes to the central government budget, and from time to time, special decisions have been made to allocate gambling proceeds to purposes specified by the Government or universal budgetary purposes [8]. The distribution of gambling proceeds (Chapter 9) may also be examined by region. The grants of the Funding Centre for Social Welfare and Health Organisations (STEA) may go towards activities that are national or local (or taking place simultaneously in different municipalities), or directed to abroad.¹

Regional gambling activities may boost tourism and, consequently, also gambling. Casino hotels and race tracks may encourage tourism [9]. While employment may be increased in companies engaged in leisure activities and tourism, gambling operation may also cause losses to other tourism or catering sector companies [9]. The building of new gambling facilities (including casinos) may have a positive impact on the value of the local infrastructure, unlike online gambling or placing slot machines in an existing facility. Opening a new game arcade and improving roads and other infrastructures (including electrical work and sewage disposal) may increase an area’s capital income, whereas the increased need for services (police, fire brigade, public transport) may also bring many costs [5].

¹ http://avustukset.stea.fi/
About the contents of the review

The list of contents of the review for 2017 is similar to the themes explored in the Yearbook of Gambling in Finland published in 2013. Additional experts have joined the ranks of the authors, which has made it possible to examine the topics from new perspectives. The review provides the readers with excellent possibilities for reflecting on the significance of the social and economic impacts of gambling for Finnish society now and in the future. The sources used for the review and the support materials and training programmes cited in it are also worth a closer look.

The review begins with a description of the Finnish gambling system’s transition (Chapter 1). Following the merger of three separate gambling operators and the Lotteries Act reform, Veikkaus Oy, a state-owned company, has had monopoly to gambling operation in Finland since the beginning of 2017. The objectives and outlines of the Finnish gambling policy strive to prevent and reduce gambling-related harms and combat abuses and crimes (Chapter 2). The most important instrument of the national gambling policy is the Lotteries Act, which also contains provisions on the supervision of gambling operation. Provisions on gambling operation, on the other hand, are contained in Government and Ministry of the Interior decrees. Finland is a European Union Member State; similar to the other Member States, it may adopt the objectives of its national gambling policy, whereas it may only restrict the offer of gambling activities if the restrictions are based on consumer protection, prevention of problem gambling, protection of minors and combating crime and fraud (Chapter 3).

The operation and marketing of gambling services in Finland is supervised by the National Police Board’s Gambling Administration department (Chapter 4). This department participates in international networks and engages in cooperation with authorities in EU and EEA countries. The National Police Board supervises both the operation and the marketing of games in order to secure the legal protection of gamblers, to prevent abuses and crimes, and to reduce gambling harms (Chapter 5). The marketing of gambling products is subject to stringent regulation (Chapter 6). Only Veikkaus Oy’s games may be marketed in Finland.

The results of the Finnish gambling survey 2015 provide information on the onset age of gambling and the past-year gambling frequency, the different game types played, online gambling and the population's attitudes towards gambling (Chapter 7). The analysis of gambling expenditure in Finland is itemised by gender, age group, level of education, employment status and the impact of net income on gambling (Chapter 8). The prevalence of gambling problems and gambling harms is examined from the perspective of the gamblers, significant others, and society. The results of the Gambling Harms Survey carried out in 2017 provide the most recent data on gambling-related harms experienced by Finnish respondents (Chapter 10).

The proceeds from gambling, which have shown a steady increase in Finland, are spent on purposes of public interest – in 2016, the gross gambling revenue of all Finnish gambling operators was approx. EUR 1.8 billion in total (Chapter 9). The proceeds are distributed as grants and transfers by the Ministry of Education and Culture,
the Ministry of Social Affairs and Health, and the Ministry of Agriculture and Forestry. It is estimated that the amount spent on games offered by gambling operators outside the country (including PAF) was EUR 170 million in 2016 (almost 9%).

The foundation for the prevention of gambling harms is laid in the Lotteries Act (Chapter 11). While the work aiming to prevent and reduce gambling harms may have the entire population or different risk groups as its target, it may also refer to treatment services and peer support groups intended for problem gamblers. Efforts to assess the harms of gambling products are also prevention. In 2015, the prevention of gambling harms was integrated in preventive substance abuse work.

Support, counselling and treatment services are available for problem gamblers and their significant others (Chapter 12). The competence of social and health care professionals has been built up by means of online courses, methodology training and local support and coordination. The review also comments on the health and social services reform from the perspective of the prevention and treatment of gambling harms.

---

2 Based on data obtained from Veikkaus Oy (Chapter 9).
References


CHAPTER 1.

The transition of the Finnish gambling system

- At the beginning of 2017, the Finnish gambling operators Fintoto Oy, Finland’s Slot Machine Association and Veikkaus were merged to form a new gambling company, Veikkaus Oy.

- The Finnish gambling system continues to be based on a statutory monopoly system supervised by the authorities.

- The statutes contain provisions on the public authorities’ tasks relevant to our national gambling system.
In early 2017, Fintoto Oy, Finland’s Slot Machine Association (RAY) and Veikkaus Oy were merged to form a new, fully state-owned company named Veikkaus Oy. The reformed Lotteries Act, which enabled the merger, imposes on the company the duty to operate gambling activities responsibly. The central government steers gambling operation by many different means, and the Lotteries Act contains provisions on the tasks related to the gambling system assigned to different ministries and authorities.

1.1 NEW DEPARTURES IN GAMBLING POLICY BASED ON MONOPOLY – TRANSITION TO A SINGLE MONOPOLY COMPANY MODEL

The Government discussed Finland’s gambling policy several times in 2014 and 2015. The reason for this was the actors’ joint observation of dramatic changes taking place in the operating environment of the gambling sector. As a result of digitalisation, development in the gambling sector was leading to games becoming increasingly similar, especially in the online environment, and the Lotteries Act provisions were no longer compatible with the new type of offer of and demand for games. The monopoly system has also made it possible to update the offer of gambling services. In practice, however, the model of several monopoly actors undermined this possibility, as in order to avoid competition between the actors, each one of the three organisations operating with monopoly could only offer products specified as falling within its remit in the legislation.

Commissioned by the Government, the Ministry of the Interior initiated a study project in January 2015 to prepare a proposal for alternative solution models for Finland’s gambling system. The project assignment stressed that the Finnish gambling system should continue to be based on a monopoly system. The report produced in the course of the project was submitted to the Minister of the Interior in March 2015 [1]. The unanimous opinion of the project working group was that changes would be needed in order to uphold the monopoly system. According to the project report, the Finnish monopoly system had to be improved by combining the gambling operations of Veikkaus Oy, Finland’s Slot Machine Association and Fintoto Oy, or at least by merging the operations of Veikkaus Oy and Finland’s Slot Machine Association. In the latter option, Fintoto Oy would have remained an independent company. The project’s parliamentary steering group supported the primary proposal given in the report, which was merging the operation of all three gambling companies.

In September 2015, the Government decided to initiate a legislative project under the leadership of the Ministry of the Interior to merge the gambling operators’ activities. Earlier, representatives of the central government, the gambling operators and the beneficiary groups had concluded a memorandum of understanding in August 2015 aiming to ensure the voluntary commitment of the gambling operators to the practical steps required by a transition to a single monopoly operator model.
In October 2015, the Ministry of the Interior initiated a project on merging the operation of the three companies. The project was prepared in broad-based cross-administrative cooperation. The Ministry of the Interior was tasked to prepare proposals for amendments to the Lotteries Act and the provisions on the distribution of proceeds for the purposes of merging the gambling operators’ activities. The Prime Minister’s Office was assigned the task of preparing a proposal for measures relating to the company law aspects of merging the gambling operators into a single public limited company fully owned by the state. In addition, the National Police Board produced a separate report on reorganising the supervision of gambling activities in connection with this project. The government proposal for acts amending the Lotteries Act and certain acts associated with it produced as a result of this project (HE 132/2016) was submitted to the Parliament in September 2016, and the amendments were adopted by the Parliament in December of the same year.

1.2 THE REFORMED LOTTERIES ACT

The reformed Lotteries Act entered into force on 1 January 2017. This Act gives Veikkaus Oy, a company fully owned by the state, monopoly to operate gambling activities in Finland. Under the Lotteries Act Veikkaus Oy shall, while operating gambling activities, secure the legal protection of gamblers, strive to prevent abuses and crimes, and prevent and reduce the financial, social and health harms caused by gambling. The company has a management board to monitor and supervise the fulfilment of these duties. According to the updated definitions of gambling products included in the Lotteries Act, Veikkaus Oy also has the right to offer consumers new virtual games and different combinations of games.

As the Act was amended, the provision on its purpose was also updated, stressing the significance of preventing harms in connection with merging the gambling operators’ activities. The purpose of the reworded Lotteries Act is not only to reduce but also to prevent the social and health harms caused by gambling. Pursuant to the new wording, the obligation to prevent and reduce the harms now also applies to financial harms caused by gambling. A similar obligation was included in provisions on the company’s duties and the operation of gambling activities.
1.3 ACTORS IN THE FINNISH GAMBLING SYSTEM

In mainland Finland acts are passed by the Parliament, and the most important piece of legislation in terms of gambling is the Lotteries Act. The Lotteries Act contains provisions on gambling operation and the tasks of the different ministries and authorities with a role in the gambling system. The Parliament also makes decisions on the state budget. Entries are made in the state budget each year for appropriations approximating to the profits of Veikkaus Oy in that budget year. These appropriations are used to distribute Government grants and transfers for public interest purposes prescribed in the Lotteries Act. For more information on the use of the proceeds, see section 9.3.

In addition to the Parliament, the Government makes decisions on key gambling policy issues. Provisions on such aspects as the operation of gambling activities and rendering accounts of the gambling company's proceeds are contained in a Government Decree.

The Ministry of the Interior is responsible for drafting and coordinating gambling policy and legislation. Among other things, the Ministry of the Interior drafts Government decrees applicable to gambling activities and issues game rules in a decree.

The Gambling Administration of the National Police Board, which operates in the Ministry of the Interior's administrative branch, is responsible for supervising gambling operation. Gambling operation is supervised to secure the legal protection of gamblers, to prevent abuses and crimes, and to reduce the social and health harms of gambling. The National Police Board supervises compliance with the Lotteries Act and the Consumer Protection Act in the marketing of games. The National Police Board also keeps statistics on gambling activities. For more information on supervision, see Chapters 4 and 5.

An Advisory Board on Gambling appointed by the Government operates in conjunction with the Ministry of the Interior and monitors the achievement and development needs of gambling policy objectives. More detailed provisions on the tasks and composition of the Advisory Board are laid down in a Government decree.

The Ministry of Social Affairs and Health is responsible for monitoring and studying gambling-related harms and developing their prevention and treatment. It fulfils this task in cooperation with the National Institute for Health and Welfare. For more information on monitoring gambling harms, see Chapter 11.

A working group that evaluates the risks and harms associated with gambling operates in conjunction with the Ministry of Social Affairs and Health. Its work is part of the Ministry's overall task of monitoring and preventing problems caused by gambling. For more information on the evaluation of harms, see section 11.2.

The Prime Minister's Office is responsible for the ownership steering of Veikkaus Oy. More information on the ownership steering is provided in the context of the steering of gambling operation in section 2.2.

The Ministry of Finance prepares a proposal for a state budget for the Parliament. The ministries that distribute the gambling proceeds, or the Ministry of Education and Culture, the Ministry of Social Affairs and Health and the Ministry of Agriculture and Forestry, participate in preparing the budget proposal. They also make decisions on the allocation of the central government transfers and grants distributed from Veikkaus Oy's
The Management Board of Veikkaus Oy has the duty to monitor and supervise compliance with the Lotteries Act in the company’s gambling activities. In addition, the Management Board supports cooperation between the company and its stakeholders.

The Lotteries Act contains a provision on Veikkaus Oy’s obligation to reimburse certain expenses incurred by the central government due to gambling activities and the preparation of grant allocation. Veikkaus Oy shall reimburse the expenses incurred in the supervision of gambling activities as well as the costs of monitoring and studying gambling-related harms and developing prevention and treatment. Additionally, Veikkaus Oy shall reimburse the central government for one half of the personnel and other costs of STEA’s activities.

The Lotteries Act also contains a provision on Veikkaus Oy’s duty to provide information on its gambling activities to different actors. Veikkaus Oy must submit an annual report to the ministries involved in distributing the proceeds, the Ministry of the Interior and the National Police Board on the development of its gambling operation and the measures it has taken to prevent and reduce gambling-related harms. Veikkaus Oy also has to submit its operational plan, budget and financial statements to these actors and the Ministry of Finance each year, as well as a report on its marketing activities to the Ministry of the Interior and the Police Board annually. Additionally, Veikkaus Oy shall provide data on gambling activities to the National Police Board for statistical purposes, and the necessary information for the monitoring and study of gambling harms and evaluation of the harmfulness of games to the Ministry of Social Affairs and Health.

Veikkaus Oy shall remit the proceeds from gambling activities to the ministries in charge of distributing the proceeds in the proportion determined by the purposes laid down in the Lotteries Act. A share of 53% of the proceeds is remitted to the Ministry of Education and Culture, 43% to the Ministry of Social Affairs and Health, and 4% to the Ministry of Agriculture and Forestry. For more information on the proceeds of gambling, see Chapter 9.

References


Figure 1a. Actors in the Finnish gambling system

**Parliament**

**Government**
- Decree on Veikkaus Oy’s gambling operation
- Decree on rendering accounts of Veikkaus Oy’s proceeds
- Decrees on grants and transfers

**Ministry of the Interior**
- Gambling policy steering
- Decrees on game rules and other implementing decrees

**Advisory Board on Gambling**
- Monitors the implementation of gambling policy objectives and development needs

**Ministry of Social Affairs and Health and National Institute for Health and Welfare**
- Monitor problems and conduct research
- Develop prevention and treatment

**Working group on evaluating risks and harms**
- Issues statements on risks for decrees on game rules
- Evaluates risks related to the impacts of other changes proposed in games
- Monitors and evaluates harms caused by gambling activities

**Prime Minister’s Office**
- Veikkaus Oy’s ownership steering

**Ministry of Finance**
- Prepares state budget

**National Police Board (Gambling Administration)**
- Supervises gambling operation and marketing statistics

**Provides data**

**Reimburses costs**

**Renders accounts of proceeds**

**Veikkaus Oy**

**Veikkaus Oy’s Management Board**
- Monitors and supervises compliance with legislation in the company’s gambling operation
- Supports cooperation between the company and its stakeholders

**Ministry of Agriculture and Forestry**

**Ministry of Education and Culture**

**Ministry of Social Affairs and Health**
- Allocate grants and transfers
- Prepare state budget

**Funding Centre for Social Welfare and Health Organisations (STEA)**
- Prepares grant allocation (promotion of health and social welfare)
CHAPTER 2.

Gambling policy and its implementation

- The central principle of Finnish gambling policy is preventing and reducing gambling harms at the individual and societal level.

- The central government steers the gambling policy and its implementation by means of legislation, supervision carried out by the authorities, and ownership steering.

- The Advisory Board on Gambling as an expert body on gambling policy monitors the achievement of the gambling policy objectives and the needs to develop them.
The objective of the Finnish gambling policy is preventing and reducing gambling-related harms. The Finnish gambling system is based on statutory monopoly. The most important gambling policy instrument is the Lotteries Act and the decrees issued by virtue of it. In addition to guidance by legislation, the central government directs gambling activities by means of the state’s ownership steering. The Advisory Board on Gambling operating in conjunction with the Ministry of the Interior monitors the achievement and development needs of gambling policy objectives as an expert body.

2.1 BASIC GAMBLING POLICY OUTLINES

Gambling significantly differs from other economic activity in its nature. No new economic value can be created solely by collecting and redistributing economic inputs and, on the other hand, the games and gambling proceeds have major social and societal impacts. While gambling and gambling operation have historically been known to occur in all communities, attitudes towards gambling as a social, cultural and societal phenomenon have varied in different countries and eras.

In Finland, gambling policy has been seen as a regulatory issue related to preventing abuses and crimes and drafting social and health policy. As a gambling policy instrument, gambling regulation has the aims of preventing and reducing the financial, social and health harms caused by gambling and crime associated with gambling. Regulation has also been considered necessary to secure the legal protection of the participants in gambling operation. A monopoly system has been found the most effective way of achieving these gambling policy objectives in Finland. The advantage of a monopoly system is that, in terms of preventing gambling harms, it is easier to restrict the activities of a monopoly operator than to control a system based on competition between several actors.

The proceeds from gambling are spent on purposes of public interest. However, financing public interest activities is not a justification for keeping up a monopoly system in gambling activities.

The Finnish gambling policy and regulation intervene in both the nature of the games and the way they are operated. A key principle of the Finnish gambling policy is that gambling operation is always within the scope of the authorities’ supervisory duties.

2.2 STEERING OF GAMBLING OPERATION

The Lotteries Act gives Veikkaus Oy, a company fully owned by the state, monopoly to operate gambling. The monopoly system is an effective way of preventing and reducing gambling-related harms, especially when the monopoly holder is subject to central government steering. When the central government has not only recourse
to legislative steering but also an effective ownership steering or other management role in the gambling organisation, this offers another possibility of regulating gambling operation, for example when laying down the gambling organisation's internal rules and product development policy.

The key gambling policy instrument is the Lotteries Act and the Government and Ministry of the Interior decrees on gambling operation issued by virtue of it which, among other things, restrict the availability and offer of games. The Lotteries Act also contains provisions on the supervision of gambling operation.

Other elements of the steering of gambling operation include ownership steering and central government representatives in Veikkaus Oy's Board of Directors. Under the State Shareholdings and Ownership Steering Act (1368/2007), which applies to Veikkaus Oy, ownership steering means the exercising of the State's right to vote in general meetings as well as to other measures by which the State as a shareholder contributes to companies' administration and operating principles. The ownership steering of Veikkaus Oy is handled by the Prime Minister's Office.

In connection with the Lotteries Act reform, the provision on the tasks of the Advisory Board on Gambling was also amended. The Advisory Board on Gambling has a role in the central government's steering of gambling operation. In the context of drafting the Lotteries Act, it was deemed that an expert body, such as an advisory board, to coordinate and reconcile different objectives continues to be necessary. An Advisory Board on Gambling appointed by the Government operates in conjunction with the Ministry of the Interior and monitors the achievement and development needs of gambling policy objectives. More detailed provisions on the tasks and composition of the Advisory Board are laid down in a Government decree (658/2017).

### 2.3 RESTRICTIONS ON GAMBLING OPERATION

The Lotteries Act sets concrete restrictions on gambling operation and authorises the Government or the Ministry of the Interior to lay down provisions on certain issues in decrees.

Among other things, the Lotteries Act contains the following restrictions:

- gamblers may not be allowed to participate in games on credit or by paying a deposit
- the gambler’s identity and place of residence must be verified when playing online games
- persons aged under 18 may not be allowed to gamble
- slot machines and casino games must be placed in supervised facilities.

The prohibition of allowing underage persons to gamble applies to both the gambling company itself and its partners that keep its games available. In practice, compliance
with the age limit is supervised by the staff in game arcades and shops, for instance. The need to enforce the age limits also results in an obligation to place slot machines in an area where the staff can see them. The mandatory identification requirement in online gambling enables effective enforcement of the age limit.

In certain situations specified in the Act, a casino operator has the right to refuse access to the casino or restrict a client’s gambling. The Lotteries Act also contains provisions on restrictions related to marketing (see section 4.6).

Government Decree on gambling operation (1414/2016) contains provisions on, among other things, the percentage of money wagered by gamblers that must be paid out as winnings (return rates), how winnings are to be rounded and how any unclaimed winnings are to be distributed. The decree also contains provisions on the numbers of slot machines and designated game arcades, as well as the number, locations and opening hours of casinos. The game rules issued in a Ministry of the Interior decree (82/2018) contain quantitative and temporal restrictions on gambling. The rules specify such details as the draw intervals of game rounds and the greatest stakes in the games. The provisions on online gambling using a gaming account in this decree concern daily and monthly loss limits in fast-paced lottery games, limits on amounts of money transferred from a bank account to a gaming account, a counter that keeps track of long periods of gambling as well as the gamblers’ possibility of self-exclusion for a fixed term or until further notice.

Veikkaus Oy offers gamblers various possibilities for controlling their playing (Chapter 11). No separate provisions on the availability of these tools exist at the moment. The Lotteries Act only notes that the gambling operator shall, where necessary, set quantitative restrictions and time limits specific to game categories, game types, games and gamblers for the playing of online games. Examples of such tools provided by the gambling company are the possibility of setting self-imposed spending limits and gambling bans for a fixed term offered on the company’s gambling site.

References

Decree 1414/2016. Government Decree on Veikkaus Oy’s gambling operation.
CHAPTER 3.

The international operating environment of gambling

- No harmonised gambling legislation exists in the European Union.

- The European Commission has found that the Finnish monopoly system meets the preconditions set for maintaining a monopoly system in the European Union.

- An expert working group established by the European Commission exchanges experiences and good practices and provides advice and expertise for the preparation of gambling sector initiatives.
Gambling legislation has not been harmonised in the European Union. Most Member States today have a gambling system based on licences, especially for online gambling. Of the Nordic countries, Denmark opened up its online gambling market in 2012. Sweden is currently considering the dismantling of its gambling system based on monopoly and replacing it with a licensing system, at least for some gambling products. Norway, on the other hand, is another Nordic country having recently decided that its gambling system will continue to be based on monopoly.

3.1 RESTRICTIONS ON GAMBLING IN THE EUROPEAN UNION

As a European Union Member State Finland can, within certain limits, decide on its national gambling policy. While the Member States may freely adopt their gambling policy objectives, any restrictions on the provision of gambling services must, however, meet the requirements of non-discrimination and proportionality set in the European Court of Justice’s case-law. Particular justifications for restrictions acknowledged in the case-law include consumer protection, prevention of problem gambling, protection of minors and combating crime and fraud. While the gambling system may be based on monopoly, the restrictions on gambling operation must be geared to consistently and systematically achieving the goals set for them. They must also be essential and proportionate considering their objectives.

In a monopoly system, the authorities must also efficiently supervise the expansion of gambling operation. If a Member State engages in a strongly expansive gambling policy by excessively inciting and encouraging consumers to gamble, its gambling operation cannot be deemed consistent and systematic. In practice, this means that both the marketing of games and the development of new games must be supervised.

3.2 EUROPEAN COMMISSION ACTIONS

In connection with a notification procedure concerning the Lotteries Act amendment in autumn 2016, the European Commission issued comments to Finland. By complying with the guidelines contained in these comments, Finland can continue to maintain its gambling system based on monopoly. In its comments, the Commission found that the proposal on introducing a single-operator model will not affect the monopoly system as such. The Commission reminded Finland of the European Court of Justice’s case-law on the permissibility of a monopoly system and stressed that the authorities will also have the duty to ensure compliance with European Union legislation in keeping with the Court’s case-law in the future. The Commission noted that the new gambling company must be stringently supervised, and that any games of a new type must be
consistent with the objectives of Finland’s gambling policy. The Commission also pointed out that the Finnish authorities have to make sure that the consumers are guided towards using the legal and supervised services.

In 2012, the Commission established an expert working group on gambling services composed of Member State representatives to exchange experiences and good practices and provide advice and expertise for the preparation of European Union initiatives. The establishment of the working group is one of the measures proposed by the Commission in its 2012 communication titled “Towards a comprehensive European framework for online gambling” [1].

Based on preparative work carried out in the expert working group, the Commission issued a Recommendation on principles for the protection of consumers and players of online gambling services and for the prevention of minors from gambling online in summer 2014 [2]. A Cooperation Arrangement concerning online gambling services between the regulatory authorities for gambling in the EEA Member States was completed in autumn 2015, similarly resulting from the working group’s efforts. The Cooperation Arrangement was adopted and signed by the Member States in November 2015.

The Commission has decided to extend the expert group’s term of office until the end of 2018. Among other things, the expert group has continued the discussion on harmonising the technical requirements for online gambling services that was included in the proposals for measures in the Commission’s communication and that began during the expert group’s previous term of office.

References


[2] Commission recommendation on principles for the protection of consumers and players of online gambling services and for the prevention of minors from gambling online (2012/478 EU).
Basic principles of gambling supervision

- The goal of the Finnish gambling system is to secure the legal protection of gamblers, prevent abuses and crimes related to gambling, and reduce and prevent the financial, social and health harms caused by gambling.

- The National Police Board’s Gambling Administration is in charge of supervising gambling operation in Finland.

- The supervision targets both the company operating gambling operation under monopoly and actors providing or marketing games in breach of the Lotteries Act.

- In recent years, international cooperation and the significance of authorities’ networks have been stressed in the supervision.
This chapter only deals with supervision in mainland Finland, as under the Act on the Autonomy of Åland, the region has its own legislation that regulates gambling.\(^3\)

Efficient supervision of the Finnish gambling system is a precondition for the reliability and permanence of the monopoly system. Supervision and systematic intervention in any operation and marketing of gambling in breach of the Lotteries Act will guarantee the possibilities of maintaining the system in the future. Supervision also has a major role in preventing and reducing negative phenomena associated with gambling, including financial, social and health harms.

### 4.1 PURPOSE OF SUPERVISION

The Finnish gambling system is underpinned by the objectives laid down in section 1 of the Lotteries Act: securing the legal protection of gamblers, preventing abuses and crimes associated with gambling, and reducing and preventing the financial, social and health harms of gambling. Gambling operation has certain negative impacts on society, and for this reason, the National Police Board supervises both the operation and the marketing of games across the country (nationwide excluding the Åland Islands).

To ensure that intervention in these harms is as effective as possible, the National Police Board carries out advance, real-time and retrospective supervision. In advance supervision, interaction with Veikkaus Oy is emphasised. Advance supervision is also carried out in cooperation with other Finnish, European and international authorities. Among other things, the National Police Board issues statements related to the drafting of statutes to the Ministry of the Interior and provides instructions for consumers and stakeholders.

Real-time computerised supervision and oversight by official supervisors play a major role in securing the legal protection of gamblers and ensuring the integrity, speed and reliability of gambling activities and the integrity of game event data. For more information on computerised supervision, see section 5.3.

Retrospective supervision of gambling includes the recommended decisions procedure. If a gambler and Veikkaus Oy disagree on the payment of winnings, the gambler can request a recommended decision from the National Police Board. An amendment to the Lotteries Act that entered into force in 2010 strengthened the National Police Board’s competence by authorising it to prohibit the operation and marketing of a game and giving it the option of imposing a conditional fine to enforce the prohibition.

---

\(^3\) Landskapslag om lotterier, 1966:10; landskapslag om ändring av landskapslagen om lotterier, 2016:11 and landskapslag om lotteriinspektion, 2016:10.
The same amendment also raised the age limit for gambling to 18. The prohibition of permitting people under 18 years of age to gamble applies both to Veikkaus Oy and traders and organisations that keep its games available or offer facilities for gambling. The legislation on the age limit for gambling has made a great contribution to preventing gambling harms, as research indicates that starting gambling at a young age is an obvious risk factor for developing a gambling problem.

Both the supervision of legal gambling activities and their marketing and the supervision of and intervention in operating and marketing illegal games play a key role in the Finnish monopoly system. For more information, see Chapter 6. The internationalisation of gambling, which has continued for an extensive period, and the strong increase in online gambling mean that smooth international cooperation, for instance with the supervisory authorities in other countries, is a precondition for efficient supervision.

The National Police Board’s Gambling Administration can only ensure efficient supervision by working closely together with other organisations associated with gambling. These stakeholders include the Ministry of the Interior, which drafts gambling sector legislation; the Prime Minister’s Office, which is responsible for ownership steering; the ministries that distribute the gambling proceeds (the Ministry of Social Affairs and Health, the Ministry of Education and Culture and the Ministry of Agriculture and Forestry); the Ministry of Social Affairs and Health and the National Institute for Health and Welfare, which collect data and carry out research on gambling harms; a large number of social and health care sector NGOs working directly with gambling harms; and, naturally, Veikkaus Oy.

Under the Lotteries Act, game rules are adopted by the Ministry of the Interior in a decree. The game rules include stipulations on paying out winnings, return of stakes, and the largest permissible stakes and winnings in slot machines, special machines and casino games. The rules of money lotteries as well as pools, betting and totalisator betting games must also include stipulations on the draws. The rules may also contain other stipulations aiming to reduce gambling-related harms.

### 4.1.1 Entry of new games into the market

A new game may enter the market and be made available for gamblers in different ways. For a game of a completely new type, new rules that contain the elements discussed above must be specified and confirmed in a Ministry of the Interior decree. The rules must also be modified if a change which is not enabled by the current rules is being planned in a game. A draft of the game is typically presented to the National Police Board, the Ministry of Social Affairs and Health and the Ministry of the Interior before the rules are confirmed. Once the Ministry of the Interior has perused the introductory material for the game, it can issue its preliminary opinion to Veikkaus Oy on whether the game should be developed further. In this case, work to develop the supervisory systems will also be initiated to prepare for the possibility that the game will be finally approved by a Ministry of the Interior decree.
The Ministry of the Interior circulates the proposed rules for comments, and the National Police Board and any other stakeholders give their statements on the proposal. In its statement, the National Police Board assesses the proposed rules from the perspective of supervising gambling operation and considers the game’s compliance with the legislation, its impacts on gamblers’ legal protection, potential abuses and their prevention, and the social and health harms caused by gambling. After circulation for comments, the Ministry of the Interior may issue the decree as proposed, amend it, or decline to issue a decree, in which case the game cannot be legally brought out.

A modification made in a game usually requires amendments to its rules, however not always. If, after the planned modification, the game continues to comply with the existing rules, there is no need for changes. A change in the rules is not usually required merely because of changes in the visual appearance or entertainment format of the game. Changes of this type are typically made in online scratch cards and slot machines. However, the planned modifications are presented to the National Police Board, which pays attention to the functionalities of the games, their visual appearance and the instructions given to the consumers for playing the games. It is often also possible for the authorities to test a game in advance in a virtual staging environment or at a game presentation. If necessary, the National Police Board will give Veikkaus Oy its views of launching the game.

4.1.2 Permitted forms of gambling activities
Veikkaus Oy may only operate games defined in the Lotteries Act. The reformed Lotteries Act also contains provisions on combination games, which may feature characteristics from several different games. The combination games, too, have specific rules to define them. In other words, Veikkaus Oy is allowed to bring to the market games whose characteristics combine features from different forms of gambling. This also stresses the need to evaluate the risk of gambling harms associated with the games. As the only legal operator, Veikkaus Oy may also offer at the same outlet games that previously were within the scope of the monopoly of three different gambling operators.

4.2 SUPERVISORY ORGANISATION
The National Police Board’s tasks include planning, directing, developing and supervising police operations and the related support functions. In addition, it is responsible for the equal availability of police services nationwide, decides on cooperation between police units and is in charge of their performance management.

Gambling Administration is a National Police Board department which, since the reform of the police organisation in 2017, has been directly subordinate to the National Police Commissioner. In early 2017, the Gambling Administration’s resources allocated to the supervision of gambling were increased from about 12 to
more than 15 person-years. Resources have been increased in an effort to meet the requirements set for gambling supervision better.

Finland differs from the other Nordic countries in that the operation of all legal gambling has been centralised to a single operator, Veikkaus Oy, which is fully owned by the state. Another difference lies in the relative expenditure on gambling. The amount spent on gambling in Finland exceeds the average for the Nordic countries (Norway, Sweden, Finland and Denmark) by approximately 40%. Finland is also different from the other Nordic countries in terms of the supervisory activities: the Finnish authorities have access to real-time computerised supervision. In Finland, supervision is to a great extent based on game event data, which the supervising authority can access in an unaltered form. In some games, random numbers are generated on servers hosted by the authorities.

### 4.2.1 International stakeholder cooperation

International cooperation is part of the extensive and effective supervision of gambling operation. The Gambling Administration is an active member of international networks, including the European Commission’s expert group on gambling services, the GREF (Gaming Regulators European Forum) and the IAGR (International Association of Gaming Regulators). Cooperation between the authorities plays a key role in...
international supervision. On the Commission’s initiative, a Cooperation Arrangement between the regulatory authorities for gambling in the EU and EEA Member States was put in place in November 2015. Among other things, inter-authority cooperation focuses on issues of regulation, gambling operators and consumer protection, reduction of unnecessary administrative barriers, responsible gambling, protecting players from harms as well as information exchanges on technology use. The Gambling Administration works together with the other Nordic countries and EU Member States in the areas of statistics and reporting.

**FIGURE 4b. Areas of gambling oversight**

<table>
<thead>
<tr>
<th>European and international cooperation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interaction with the gambling company</td>
</tr>
<tr>
<td>Expert statements, e.g. on Ministry of the Interior decrees (incl. game rules)</td>
</tr>
<tr>
<td>Statements/guidelines for gambling companies and other stakeholders, including citizens and businesses.</td>
</tr>
<tr>
<td>Recommended decisions</td>
</tr>
<tr>
<td>Computerised supervision, standing by</td>
</tr>
<tr>
<td>Storage of game data</td>
</tr>
<tr>
<td>Supervision related to money laundering</td>
</tr>
<tr>
<td>Conditional fines, prohibition of operating or marketing</td>
</tr>
<tr>
<td>Official supervisors</td>
</tr>
<tr>
<td>Marketing policies</td>
</tr>
<tr>
<td>Supervision of marketing</td>
</tr>
<tr>
<td>Advance supervision</td>
</tr>
<tr>
<td>Real-time supervision</td>
</tr>
<tr>
<td>Retrospective supervision</td>
</tr>
<tr>
<td>Goals of supervising gambling activities: securing legal protection, preventing abuses and offences as well as reducing social and health harms.</td>
</tr>
</tbody>
</table>

Preventing illegal activities
- European cooperation
- International cooperation

Monitoring/combating illegal activities
- Requests for EU cooperation

Intervening in illegal activities
- Supervision of marketing interventions in illegal marketing

Information activities | Statements | Advice | Guidelines | Website
Purpose of supervision: ensuring legal protection and preventing abuses and crimes

- The gamblers’ legal protection and consumer protection perspectives are taken into consideration in the supervision of gambling.

- The National Police Board can prohibit the operation and marketing of gambling in breach of the Lotteries Act and impose a conditional fine to reinforce the prohibition.

- The National Police Board supervises Veikkaus Oy’s compliance with the Act on Detecting and Preventing Money Laundering and Terrorist Financing.

- Computerised supervision plays a key role in the strict, reliable and credible supervision of gambling, which is a requirement set by the European Union on monopoly systems.
The annual value of gambling operation in Finland exceeds EUR 3 billion. Such an extensive economic activity of a particular nature always also comes with its specific risks. The National Police Board is thus tasked to supervise gambling operation to guarantee the participants’ legal protection, prevent abuses and crimes, and reduce the social and health harms of gambling.

5.1 ENSURING CONSUMERS’ LEGAL PROTECTION

Gambling products are goods of a special nature. Operating these games is unlike usual economic activity, and implementing the consumers’ legal protection is stressed in gaming. Guaranteeing the consumers’ legal protection is one of the most important tasks of gambling supervision. Primarily, the National Police Board performs this task by ensuring that games are operated in compliance with the Lotteries Act and the relevant decrees. In addition, the National Police Board takes gamblers’ legal protection into account in its role as the expert authority, for example in the context of approving new or modified game rules.

The consumers’ legal protection must be addressed in all stages of gambling, including registration as a customer, transferring money to the gaming account, participation in a game and payouts. Supervision of marketing can also be considered a supervisory action that secures the consumer’s legal protection. The National Police Board is informed of shortcomings in consumers’ legal protection either through its own observations, consumers’ customer experiences or third-party reports. Besides directly on the activities of Veikkaus Oy, observations may also be made on the activities of its representatives selling games. The National Police Board is also responsible for supervising the marketing of games, a stage in which the consumers’ legal protection is important. For more information on the supervision of marketing, see Chapter 6.

Computerised supervision (section 5.3) and the identification of gamblers, which is closely related to it, are a central form of oversight. This means that the gamblers are identified before playing, and they can also be easily linked to the game they played at a later date. Identifying a gambler of an online game is a statutory requirement, but the gamblers can also be identified at other outlets. Identifying the gamblers is one method of preventing abuses and ensuring that the consumers’ legal protection is implemented, as computerised supervision makes it possible to investigate all stages of a gambler’s game. This also reinforces Veikkaus Oy’s legal protection and contributes to the reliability of the gambling system. The National Police Board only supervises the implementation of the consumers’ legal protection in games operated by Veikkaus Oy, the holder of statutory monopoly.

---

4 A representative refers to traders and organisations (such as shops and kiosks) that handle registrations of participation and payments associated with Veikkaus Oy’s games.
5.1.1 Official supervisors
The official supervisors of gambling operation are appointed by the National Police Board. Their role is to ensure compliance with game rules in gambling operation. Additionally, they confirm the results of pools, betting and totalisator games and the amounts of winnings. The majority of the official supervisors' tasks is completed as official duties in the facilities of the National Police Board's Gambling Administration in Riihimäki. The National Police Board also appoints among its personnel official supervisors who prepare and supervise Lotto and Euro jackpot draws at MTV studios in Helsinki and additional scratch card draws in Veikkaus Oy's facilities. For more information on the official supervisors, see section 5.3.4.

5.1.2 Recommended decisions
In order to guarantee gamblers’ legal protection, the Lotteries Act includes provisions on a recommended decisions procedure. By application of a gambler, the National Police Board's Gambling Administration may issue a recommended decision in case there is a dispute on a payout between Veikkaus Oy and the gambler. The recommended decision procedure only applies to gambling operated by Veikkaus Oy. The recommended decision may not be appealed. It is also not legally valid or final, nor can enforcement action be taken by virtue of it. A recommended decision does not, in case of a dispute, prevent the gambler or Veikkaus Oy from bringing a legal action before a general court or settling the dispute.

A recommended decision was requested from the National Police Board 68 times in 2012, 107 times in 2013, 64 times in 2014, 66 times in 2015 and 51 times in 2016. If the dispute between the gambling company and the gambler concerns an issue other than a payout, a statement rather than a recommended decision is given. This also applies to late applications for a recommended decision (received more than 30 days after the result was confirmed).

The requirement of treating equally players who are in the same position, which is part of gamblers’ legal protection, means that when a gambler applies for a recommended decision on a dispute concerning an individual payout, other gamblers also have the right to be informed of the contents of the decision without undue delay.

The National Police Board sees to it that Veikkaus Oy applies consistent rules to all gamblers who are in a similar position. Veikkaus Oy has the duty to provide information on the decisions it has made on the basis of recommended decisions and to advise gamblers on what they should do in a dispute similar to one in which the company has, on a previous occasion, ended up paying the winnings to another gambler. The information procedure was introduced in 2015.
5.1.3 Statements
The National Police Board may issue statements and guidelines on operating and supervising lotteries to Veikkaus Oy, consumers, the authorities or others in need of an interpretation of the law, either on request or on its own initiative. The statements also represent another way of protecting consumer rights. For example, a gambler may request a statement from the National Police Board when the recommended decision procedure cannot be used.

The National Police Board has jurisdiction to supervise the legality of gambling operation regulated under the Lotteries Act as well as illegal gambling operation and its marketing in Finland. The National Police Board has no jurisdiction to secure the legal protection of gamblers located in Finland who play games offered by foreign gambling companies. On the other hand, the National Police Board also intervenes in illegal gambling in order to maintain a credible monopoly system and to secure Veikkaus Oy’s operating preconditions.

5.2. PREVENTION OF ABUSES AND OFFENCES

5.2.1 Intervention in gambling operation breaching the Lotteries Act
Supervision of gambling operation that breaches the Lotteries Act means intervention in illegal operation and marketing and processing initiatives received from outside the administration. Gambling operated by others than the holder of statutory monopoly in Finland is prohibited and punishable under the Criminal Code. The National Police Board can send a request for a statement to the gambling operator, or request a police investigation to establish if the gambling operator or some other party, including an actor promoting such activities, is guilty of an offence.

Since 2010, the National Police Board has had jurisdiction to prohibit the operation and marketing of gambling. To enforce such prohibitions, the National Police Board can impose a conditional fine. Decisions on payment of a conditional fine imposed to enforce a prohibition on gambling operation are made by the National Police Board, whereas decisions on payment of a conditional fine imposed to enforce a marketing prohibition are made by the Market Court on the National Police Board’s application. For information on the supervision of the marketing of gambling activities, see Chapter 6.
5.2.2 Prevention of money laundering and the financing of terrorism

As an economic activity, gambling is a potential channel for money laundering. In addition to Veikkaus Oy, the Act on Detecting and Preventing Money Laundering and Terrorist Financing (444/2017), or the Money Laundering Act, applies to its representatives who handle registrations of participation and payments associated with the games offered by Veikkaus Oy. Under the Money Laundering Act, these actors have on certain grounds the obligation to identify their customers, to monitor any extraordinary business transactions and report any suspicious transactions to the Financial Intelligence Unit. In 2016, a total of 12,165 gambling-related reports were made (including reports by Veikkaus Oy, Finland’s Slot Machine Association and Fintoto as well as PAF). The fact that gambling increasingly takes place online is a positive development from the perspective of preventing money laundering, as gamblers need a personal gaming account to play online games offered by Veikkaus Oy, which means that they have been identified.

The Money Laundering Act was amended following the adoption of the so-called fourth Anti-Money Laundering Directive adopted in 2015 (2015/849/EC). The amendment entered into force on 3 July 2017. It expanded the scope of the Act to all types of gambling (excluding slot machines placed outside casinos) and also put the representatives handling registrations of participation and payments associated with games offered by the gambling company within the scope of official supervision. As required under the Directive, the new Act emphasises a risk-based approach and imposes an obligation to produce not only national risk assessments but assessments specific to each supervisor and party liable to submit notifications in order to identify and assess the risks of money laundering and financing of terrorism. As part of the legislative reform, the system of penalties was also updated, and new types of administrative penalties were introduced.

**FATF**

EU regulation in the field of money laundering and terrorism is to a great extent based on international norms adopted by the FATF (Financial Action Task Force). The FATF is an intergovernmental body that adopts standards and develops procedures for combating money laundering and the financing of terrorism. In addition, the FATF carries out country evaluations with the aim of ensuring that sufficient action is taken to prevent money laundering and terrorism. Finland is a FATF member. All in all, FATF standards are used in more than 180 countries. The first 40 FATF recommendations were issued in 1990 to prevent the abuse of financial systems for drug money laundering. Since then, the recommendations have been modified in keeping with the changing features of money laundering crime, with the latest ones having been issued in February 2012.
5.3 COMPUTERISED SUPERVISION

Computerised supervision of gambling activities is a key supervision method and implementation model in today’s world of digital online gambling. Systematic, consistent and efficient computerised supervision is an elemental part of strict and reliable supervision of gambling, which is a precondition for maintaining Finland’s gambling policy based on monopoly.

Veikkaus Oy has been using the gambling supervision system since 1989, and it is undergoing constant development. The most recent significant upgrade took place in 2015, as the hardware and software of the system were updated to respond to the current volume of games and the fast-paced mode of gambling.

5.3.1 Supervisors’ access to game event data
Computerised supervision of gambling is mainly based on supervision of validity. Data on game events are transferred to the supervisory authority, i.e. to the computerised supervision system of the Gambling Administration. In addition, game event data from slot machines located in designated game arcades and outlets will also be transmitted to the supervisory authority in the future.

5.3.2 Use of game event data in supervision
The game event data held by the Gambling Administration allows the supervisory authority to inspect and investigate such aspects as the functioning of the electronic gambling system and the choices made by the gambler in the event of faults or suspected abuses. Through these measures, the supervisory authority aims to secure the legal rights of gamblers as well as prevent any abuses and crimes. If necessary, the game event data can be used as the basis of recommended decisions and statements issued by the Gambling Administration.

In recent years, computerised monitoring has contributed significantly to the development of reporting on game event data based supervision. In the near future, the supervising authority can use the reports to analyse different gambling phenomena. The analyses may lead to actions aiming to reduce the social and health harms caused by gambling.
5.3.3 Requirements concerning the transfer of game event data for supervisory purposes

The Gambling Administration applies the requirements of validity, speed, reliability and integrity of game event data to all data transmissions related to game events. Validity means that all data intended to be transferred to the supervisory authority is actually transferred. In addition to high data transmission speeds, the supervisory authority aims for solutions that are as risk-free as possible without interfering with the gamblers’ playing experience. Reliability means that there are no disruptions in the data communications, making it possible to ensure that all game event data are transferred. Data integrity means that the game event data to be transferred are not altered during the transmission or after it.

5.3.4 Changes in official supervision brought about by the advancement of information technology

The computerised supervision system of gambling enables real-time supervision of draws, for instance, but in most cases computerised supervision is retrospective. Due to advancements made in computerised supervision in 2012–2017, it has been possible to separate supervising draws and confirming the results into separate areas in the supervisors’ tasks. The official supervisors designated by the National Police Board continue to supervise Lotto and Eurojackpot draws in the television studio and the additional scratch card draws in Veikkaus Oy’s facilities. As part of their official duties, Gambling Administration officials confirm the results of lotteries and pools, betting and totalisator games for each round. All game event data to be supervised are validated and archived in an electronic format.

References


CHAPTER 6.

Marketing

- Marketing has a significant impact on the uptake of gambling.

- The legislation imposes more stringent restrictions on the marketing of gambling operation than on ordinary consumer trade.

- Only Veikkaus Oy is permitted to market gambling services in Finland.

- Marketing must be responsible and channel the demand towards games permitted under the Lotteries Act.

- The National Police Board supervises marketing to ensure its compliance with the legislation and may issue a decision to prohibit marketing if necessary.
Advertising for games can be seen and heard on practically all media. The introduction of new technologies, including the more widespread use of the Internet and social media, has made gambling more accessible and also significantly boosted the volume and efficiency of marketing. The marketing of gambling services is regulated under the general provisions of the Consumer Protection Act and special provisions on marketing in the Lotteries Act. The marketing of gambling is subject to more stringent regulation than marketing associated with ordinary business and consumer trade. While marketing is within the scope of the freedom of speech and expression protected as fundamental rights, unlike the exertion of societal influence, it is not part of the core area of exercising the freedom of speech.

The significance of marketing may even be greater than usual in promoting the sales of gambling services, as advertisements for games on electronic channels often provide a link that takes the consumer directly to a gambling website. Consequently, marketing has strong temporal links with the availability of gambling.

### 6.1 MARKETING OF GAMBLING SERVICES IN FINLAND

In order to prevent and reduce gambling-related harms, it has been deemed necessary to restrict the marketing of gambling. In particular, the restrictions concern the contents of marketing. While no exact restrictions have been placed on the volume of marketing, this aspect is also supervised.

The Consumer Protection Act (38/1978) lays down the general requirements for marketing directed at consumers. The Lotteries Act, on the other hand, contains more detailed provisions on marketing restrictions made necessary by the unique nature of gambling operation. The Lotteries Act lays down a specific provision that defines the marketing of gambling. Primary types of marketing include advertising that evokes mental images, or the indirect advertising of a product in connection with advertisements for another product. In addition to these, other types of sales promotion activities may constitute marketing referred to in the Lotteries Act.

In Finland, only Veikkaus Oy is permitted to market its games. This also applies to branding. The starting point for all permissible marketing is the need of channelisation. The purpose of marketing must be directing consumers towards games that are operated legally pursuant to the Lotteries Act. However, this must take place ensuring that marketing does not promote gambling which results in social or health harms. The sales of games must not be promoted solely to increase the proceeds from gambling. As a general age limit of 18 years has been set for gambling, the advertising may also not target minors.
Additionally, more stringent restrictions have been placed on the marketing of games associated with a particular risk of gambling harms. Such games regarded as having a higher risk include slot machine games, poker and other card games, betting and fast-paced online gambling. Specified information only may be provided in advertisements: information on the games, outlets where they can be played, game rules, payments, the probability of winning and the winnings. Experiential advertising of gambling is prohibited outside a casino, a designated game arcade or a race course where the game is provided. As from the beginning of 2017, advertising these games on Veikkaus Oy’s gambling website once a gambler has logged on has been permitted.

The marketing of gambling activities in Finland is supervised by the National Police Board. This supervision targets the marketing activities of Veikkaus Oy and also seeks to prevent other gambling operators’ marketing directed at Finnish consumers. The National Police Board also supervises compliance with the Consumer Protection Act (38/1978) in the marketing of gambling products.

The monitoring of marketing is based on evaluating whether or not it is compliant with the legislation in its details or when assessed as a whole. The National Police Board gathered its interpretations of the law on the marketing of gambling services in a document titled “National Police Board’s guidelines on the marketing of gambling services” in 2015 [2]. This document is a collection of information on the supervisory authority’s legal practice concerning different issues related to the marketing of gambling services.

The National Police Board has many administrative means of supervising Veikkaus Oy’s marketing efforts at its disposal, including making requests for information, issuing statements on marketing and, if necessary, prohibiting marketing that it considers illegal. At the time of producing this publication, such prohibitions have been issued to Veikkaus Oy twice. The decisions to prohibit marketing issued in 2015 concerned excessive and aggressive marketing at outlets, or supermarket checkouts, and the advertising of a game associated with a particular risk of gambling harms.

Illegal marketing by the only gambling operator permitted under the Lotteries Act, or Veikkaus Oy, is also punishable under the Criminal Code (578/2011) as a lottery offence. Similarly, the National Police Board uses administrative procedures to combat the marketing of gambling services provided by other operators. If necessary, the National Police Board can issue a prohibition of operating gambling activities enforced with a conditional fine. This prohibition may target the operation or marketing of games.
Need of channelisation: The marketing of Veikkaus Oy’s games must direct the demand for gambling towards games operated in compliance with the Lotteries Act.

“Green and red games”: The final report of the project on reforming the Lotteries Act [1] lists five characteristics of games that are regarded as having a particular impact on the risk of gambling disorder and problem gambling. These characters are a) pace of the game, b) rewarding nature of the game, c) immediacy of winning, d) importance of skill and interaction, and e) supply. This categorisation was later included in the government proposal (96/2008). Green games deemed to be associated with a lower risk of gambling harms include printed scratch cards, pools, Payazzo slot machines and certain totalisator games. The government proposal (96/2008) classifies online lotteries (online scratch cards), betting games, the majority of slot machines, casinos and casino games as red games associated with a particular risk of gambling harms.

Information on games: On red games operated by Veikkaus Oy, information about the games, the outlets where they can be played, game rules, payments, the probability of winning and the winnings may be provided. This is an exception to the prohibition of marketing red games.

Prohibited marketing: Prohibited marketing of gambling products includes the marketing of games, other than those operated by Veikkaus Oy, and their operators. The marketing of gambling products by Veikkaus Oy may also violate the marketing provisions if, for example, it describes frequent gambling in a positive light and a disinclination to gamble in a negative light, or if it is directed at minors. Advertising or other experiential marketing of the aforementioned red games operated by Veikkaus Oy constitutes prohibited marketing.
6.2 CROSS-BORDER MARKETING

Whereas only Veikkaus Oy is permitted to operate and market gambling services in Finland, the offer of gambling products directed to Finland from outside the country is promoted with copious marketing. When assessing the marketing activities of other actors, the extent to which the marketing is specifically directed at Finland plays a key role. Under a specific provision, marketing in a printed publication on sale in Finland is not prohibited if the marketing is not targeted specifically at Finland, or if the main purpose of the publication is not the marketing of games.

Exertion of societal influence, which is about exercising the freedom of speech and expression safeguarded under the Constitution, must also be separated from marketing. Exercising the freedom of speech is also relevant to marketing, but to a lesser extent, making it possible to restrict this freedom under the Lotteries Act.

Marketing in breach of the Lotteries Act is rife, especially online and in the social media. There has also been an increase in advertising by e-mails and even text messages. Gambling activities are often marketed in Finnish which, combined with other evidence, proves that the advertising is directed at consumers living in Finland.

Games are often marketed from outside the country, and an effort is frequently made to conceal the origin of the marketing material. Every year, the National Police Board has issued a number of statements and reprimands concerning illegal marketing. Operating and marketing games are also punishable as gambling offences (Act 578/2011).

The National Police Board has prohibited the marketing of illegal gambling services, for example in cases where the services have been marketed on a website or on the radio. Sports teams have also been prohibited from marketing gambling products under a sponsorship contract. So far, case-law related to the marketing of games in Finland is limited.

References


Prevalence of gambling

- The prevalence of gambling has increased in Finland between 2007 and 2015.

- Almost one out of four respondents in the 2015 population survey had played at least four game types during the past year.

- Online gambling had increased slightly between 2011 and 2015.

- Almost one half of the respondents to the 2015 population survey had a positive attitude towards gambling.
Population surveys have been conducted to monitor Finnish people’s gambling behaviour since 2003. The latest population survey data was collected in spring 2015 [1], with 4,515 Finnish respondents. This chapter describes the change in Finnish people’s gambling over time using the results of the Finnish gambling surveys from 2007, 2011 and 2015. It focuses on survey results analysed by gender and age group. For improved comparability, only respondents aged between 15 and 74 were included in the data from 2007. The results of the Finnish gambling surveys were complemented with data collected in other Finnish population surveys.

7.1 THE PREVALENCE OF GAMBLING IS HIGH IN FINLAND

The results from 2015 indicate that 80% of the respondents had gambled during the past year. At the population level, this figure corresponds to approximately three million Finnish people. Gambling was 10 percentage points more common among men than women. On average, Finnish people had played 2.3 different game types during the past year. The most popular game types were Veikkaus Oy’s lottery and scratch card games as well as the slot machines of Finland’s Slot Machine Association located outside casinos. The highest prevalence of gambling was found in Kymenlaakso, South Karelia, Ostrobothnia, Central Ostrobothnia and South Ostrobothnia. Online gambling increased by three percentage points between 2011 and 2015.

7.2 ONSET AGE OF GAMBLING

The age limits for all games were harmonised and set at 18 years between 2009 and 2011. According to the population survey results from 2015, the average onset age was 17.7 years. One half of the respondents had started gambling when they were aged under 17, and 75% when aged under 21. The average onset age varied between age groups (Figure 7a). The onset age was higher for those aged 45 or over than for the younger age groups.
7.3 PAST-YEAR GAMBLING FREQUENCY

Men typically gambled once a week (30%), whereas women gambled less often than once a month (31%). Approximately one respondent out of three (34%) gambled at least once a week (men 42%, women 26%). Six per cent of the respondents had never gambled.

The frequency of gambling has gone up by seven percentage points in Finland between 2007 and 2015 (Figure 7b). The greatest increase between 2007 and 2015 was recorded among those who gambled less often than once a week. The frequency of gambling among women increased between 2007 and 2011. This increase was seen in women in the age group 24–34 and those in the age group 65–74 who gambled less often than once a month. The frequency of gambling among men, on the other hand, decreased between 2011 and 2015.
Past-year gambling frequency increased in age groups 18–24 and 65–74 between 2011 and 2015. At the same time, there was a major drop in the share of underage gamblers. The harmonised age limit of 18 set for all games has had an impact on reducing underage gambling. On the other hand, 37% of minors had gambled in 2015, regardless of the age limit of 18.

Gambling among young people has been examined in the School Health Promotion Study, the Adolescent Health and Lifestyle Surveys and the Youth Gambling 2006 survey [2]. A link has been detected between frequent gambling and young people’s risk behaviour and poorer health. Research on young people has shown that gambling among girls and boys, even if it took place less often than once a month, was associated with risk behaviours.
7.4 POPULARITY OF DIFFERENT GAME TYPES

In 2015, one out of four respondents (23%) had played at least four different types of games. Playing many different types of games was more common among men than women. The share of those who played three or more games has increased by five percentage points among men and three percentage points among women since 2007 (Figure 7c).

FIGURE 7c. The number of different game types played in 2007, 2011 and 2015

The results from 2015 indicate that men participated the most frequently in Veikkaus Oy’s lotteries and scratch card games and played on the slot machines of Finland’s Slot Machine Association. Game types popular with women were Veikkaus Oy’s lotteries and scratch card draws as well as other games with daily draws. Men played all game types more often than women, besides Veikkaus Oy’s scratch card games.

Table 7d examines the game types most popular with each age group. It shows that the two first games on the list of the most popular games in the age group 24–34 and older were the same, whereas there were differences in the order of the third and fourth most popular games. The most popular games among the two youngest age groups, on the other hand, were different from those popular among the older age groups.
**TABLE 7d. The most popular game types by age group in 2015**

<table>
<thead>
<tr>
<th>Age group</th>
<th>Most popular game</th>
<th>Second most popular game</th>
<th>Third most popular game</th>
<th>Fourth most popular game</th>
</tr>
</thead>
<tbody>
<tr>
<td>15−17</td>
<td>Games played on ferries to Sweden and Estonia (19%)</td>
<td>Slot machines outside casinos (19%)</td>
<td>Veikkaus scratch cards (16 %)</td>
<td>Betting operated by Veikkaus (8%) / Private betting and/or card games with money as stakes (8%)</td>
</tr>
<tr>
<td>18−24</td>
<td>Slot machines outside casinos (55%)</td>
<td>Veikkaus scratch cards (53%)</td>
<td>Lotto, Eurojackpot, Viking Lotto or Jokeri operated by Veikkaus (52%)</td>
<td>Betting operated by Veikkaus (21%)</td>
</tr>
<tr>
<td>25−34</td>
<td>Lotto, Eurojackpot, Viking Lotto or Jokeri operated by Veikkaus (69%)</td>
<td>Veikkaus scratch cards (55%)</td>
<td>Slot machines outside casinos (47%)</td>
<td>Other games with daily draws operated by Veikkaus, including Keno and Naapurit (22%)</td>
</tr>
<tr>
<td>35−49</td>
<td>Lotto, Eurojackpot, Viking Lotto or Jokeri operated by Veikkaus (76%)</td>
<td>Veikkaus scratch cards (55%)</td>
<td>Slot machines outside casinos (30%)</td>
<td>Other games with daily draws operated by Veikkaus, including Keno and Naapurit (24%)</td>
</tr>
<tr>
<td>50−64</td>
<td>Lotto, Eurojackpot, Viking Lotto or Jokeri operated by Veikkaus (78%)</td>
<td>Veikkaus scratch cards (40%)</td>
<td>Other games with daily draws operated by Veikkaus, including Keno and Naapurit (26%)</td>
<td>Slot machines outside casinos (22%)</td>
</tr>
<tr>
<td>65–74</td>
<td>Lotto, Eurojackpot, Viking Lotto or Jokeri operated by Veikkaus (71%)</td>
<td>Veikkaus scratch cards (32%)</td>
<td>Other games with daily draws operated by Veikkaus, including Keno and Naapurit (21%)</td>
<td>Slot machines outside casinos (13%)</td>
</tr>
</tbody>
</table>

According to their preferences for different game types, Finnish gamblers can be classified into:

- infrequent gamblers
- Lotto and slot machine players
- players of Lotto, scratch cards and daily lottery games
- gamblers of horse betting games
- gamblers who play casino games and bet on sports, and
- omnivorous gamblers.
7.5 ONLINE GAMBLING

In 2015, the share of respondents who had played online games was 24 per cent (Figure 7e). The proportion of men was 13 percentage points higher than that of women. The highest prevalence of online gambling was found in age groups 25–34 (38%) and 35–49 (30%). The prevalence of online gambling increased between 2011 and 2015 among both women and men and in all age groups of 35 or over.

According to a study based on the population’s ICT use, male gender and young age have essential links with online gambling [3]. Online gamblers are also more often in the labour market than those who only engage in land-based gambling. Online gamblers are also more likely to play different game types simultaneously and also video, console, computer and mobile games that are not played for money or with money as stakes. In women, online gambling is associated with at-risk gambling and gambling problems more often than in men.

Figure 7e. Online gambling by gender in 2011 and 2015 (%)
7.6 POPULATION’S ATTITUDES TOWARDS GAMBLING

The Attitudes Towards Gambling Scale (ATGS) has been included in the population surveys since 2011. In the interpretation of the total score for this scale, less than 24 points reflects a negative, 24 points a neutral and more than 24 points a positive attitude towards gambling.

In 2015, almost one half (49%) of the respondents to the population survey had a positive attitude towards gambling. Men had clearly more positive attitudes than women. This finding is consistent with international research results [4,5,6]. The most positive attitudes were found in the age group 18–49, whereas the most negative attitudes were held by respondents aged under 18. By international comparison, Finnish people's attitudes towards gambling are exceptionally positive. In Finland, the attitudes have become more positive since 2011 (excluding minors).

In population surveys, men in the age group 18–54 already displayed positive attitudes in 2011 (Figure 7f). In 2015, the attitudes of men in the age group 55–64 had also become more positive. In that year, women in the age group 25–34 also had positive attitudes towards gambling. In earlier international surveys that used the ATGS, the population's attitudes were not clearly positive in general or when examined by age group or by gender.

**FIGURE 7f**: Attitudes towards gambling in 2011 and 2015; women and men total score by age group
References


Gambling expenditure

- The results of the Finnish gambling survey 2015 indicate that Finnish people spent EUR 1,487 million on gambling during the past year.

- On average, each gambler spent EUR 494.02 on gambling a year.

- Men accounted for 75% of the total gambling expenditure in Finland.

- Low-income gamblers spent clearly more than others when monthly gambling expenditure is examined in proportion to net incomes.

- Gamblers whose playing is under control accounted for less than a half (46%) of the gambling expenditure, while problem gamblers accounted for 23%, and at-risk gamblers for nearly one third (31%).
This chapter discusses Finnish people’s gambling expenditure mainly on the basis of the results obtained in the Finnish gambling survey 2015 [1]. In 2015, Finnish people spent a total of EUR 1,329 million on gambling, and each gambler spent EUR 494.02 a year. The total spending was calculated on the basis of data provided by the respondents. More than one out of ten respondents who had gambled did not provide data on their spending. If the total spending is based on the assumption that the gamblers who provided and did not provide this data spent equal amounts, the total expenditure of Finnish gamblers was EUR 1,487 million [2].

8.1 HOW MUCH MONEY IS SPENT ON GAMBLING?

The results of the population survey of 2015 indicate that on average, Finnish gamblers spent EUR 11.30 a week on gambling. Men's weekly spending on gambling was EUR 14.50, whereas the amount spent by women was EUR 7.27. On the other hand, the average weekly expenditure reported by the respondents is also affected by the frequency of gambling, giving slightly lower spending figures. When the gambling expenditure is examined in proportion to the frequency of gambling, the weekly spending on gambling was EUR 12.75 for men and EUR 5.34 for women.

International findings show, however, that gamblers tend to underestimate the amount of money they spend on gambling. Consequently, the total expenditure calculated on the basis of survey data is typically lower than figures based on account-based expenditure data provided by gambling operators (Chapter 9).

8.2 WHO SPENDS MONEY ON GAMBLING?

Men accounted for 75% of the total gambling expenditure in Finland in 2015. When looking at the expenditure by age group, gamblers in the age groups 25–34 (22%) and 55–64 (28%) accounted for the largest shares of the population's total expenditure (Figure 8a). When examined by age group, there were differences between men’s and women’s gambling expenditure [3]: the age group 55 or over accounted for the majority (63%) of women's total gambling expenditure, whereas the corresponding figure for men in the same age group was 37%. On the other hand, the age group 25–44 spent more than a quarter (27%) of men's total expenditure, while this figure for women in the same age group was 8%. The share of gamblers aged under 18 in the expenditure was 0.3%.
An examination of educational backgrounds shows that gamblers with secondary level education accounted for the majority of the total spending (71%), while those with a third-level degree spent 13% of the total amount. The majority (64%) of the gambling expenditure was spent by gamblers who were employed. On the other hand, almost one third (31%) of the total amount was spent by pensioners and gamblers who were unemployed or laid off.

When analysing gamblers’ personal net incomes, gamblers who earned more than EUR 1,500 accounted for the majority (69%) of the total spending. If we compare the weekly gambling expenditure by the population at large and by men based on net incomes, we see that the larger the gambler’s net income, the higher the amount spent on gambling (Figure 8b). The gambling expenditure of women in different net income classes did not, however, have equally straightforward correlation with gamblers’ net categories.
A different perspective on gambling expenditure is obtained when the monthly gambling expenditure is looked in relation to gamblers’ personal net income. Gamblers who had a low income clearly spent more money on gambling in proportion to their income (Figure 8c). Those with a personal net income of EUR 1,000 or less clearly spend a greater share of their income on gambling than gamblers in other net income classes. Men on low incomes, in particular, spent a significant share of their personal net income on gambling.
The results of the population survey 2015 indicate that the past-year gambling frequency, online gambling and severity of the gambling problem were linked to high gambling expenditure. Those who gambled several times a week accounted for more than one half (53%) of the total gambling expenditure, and those who gambled once a week accounted for more than a third (38%). One half (52%) of the amount was spent by online gamblers. Women, in particular, spent more money on online gambling than on land-based gambling.

The population survey also analysed different risk factors and harms associated with gambling (Chapter 10). Recreational gamblers whose gambling was under control accounted for less than a half (46%) of the gambling expenditure, whereas 23% of the amount was spent by gamblers with a gambling problem, and 31% was spent by at-risk gamblers (Figure 8d).
**FIGURE 8d. Total expenditure by the severity of gambling (%)**

<table>
<thead>
<tr>
<th></th>
<th>Total</th>
<th>Women</th>
<th>Men</th>
</tr>
</thead>
<tbody>
<tr>
<td>Problem gambling (SOGS ≥ 3)</td>
<td>23</td>
<td>31</td>
<td>46</td>
</tr>
<tr>
<td>At-risk gambling (SOGS = 1–2)</td>
<td>29</td>
<td>20</td>
<td>51</td>
</tr>
<tr>
<td>No problems (SOGS = 0)</td>
<td>21</td>
<td>35</td>
<td>45</td>
</tr>
</tbody>
</table>

**References**


Gambling proceeds

- The proceeds from gambling have increased steadily, regardless of economic cycles.

- Gambling proceeds are an incidental beneficial consequence rather than the grounds for maintaining the monopoly system.

- It is estimated that in 2016, Finnish gamblers spent EUR 170 million on gambling abroad (including PAF games).
In its case-law, the Court of Justice of the European Union has found that only public interest activities, including charities, sports or culture can be financed from the proceeds of lotteries. However, financing important causes cannot be considered objective grounds for justifying a gambling system. According to the case-law, financing social activities can only be an incidental beneficial consequence of the system (C-275/9, section 60).

For decades, gambling proceeds have made it possible to support sports, culture, arts, the activities of social welfare and health organisations, rehabilitation and treatment of war invalids and veterans as well as horse breeding and equestrian sports. In other words, a significant share of the proceeds is used to benefit Finnish society through the central government or various NGOs [1]. Gambling proceeds have increased steadily from year to year, regardless of general economic cycles. The Lotteries Act reform in early 2017 changed the allocation of gambling proceeds and the procedures associated with it.

See Table 9a for Veikkaus Oy’s turnover by games and game groups in 2017. The gambling company offer three types of games, which are lucky games (e.g Lotto, Eurojackpot, Keno), slot machine and instant games (e.g. scratch cards, digital and draw games), and skill games (e.g. fixed odds betting, football pools, toto games). The year 2017 was successful for slot machines and instant games, which made 38.3% of the total turnover [2].

### TABLE 9a. Veikkaus Oy’s turnover by games and game groups (EUR thousands) 2017

<table>
<thead>
<tr>
<th>Game Type</th>
<th>2017</th>
<th>% of turnover</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lotto</td>
<td>344,815</td>
<td>10.7</td>
</tr>
<tr>
<td>Eurojackpot</td>
<td>213,857</td>
<td>6.6</td>
</tr>
<tr>
<td>Viking Lotto</td>
<td>85,327</td>
<td>2.6</td>
</tr>
<tr>
<td>Add-on games</td>
<td>105,659</td>
<td>3.3</td>
</tr>
<tr>
<td>Keno</td>
<td>338,325</td>
<td>10.5</td>
</tr>
<tr>
<td>Other daily draw games</td>
<td>66,868</td>
<td>2.1</td>
</tr>
<tr>
<td>Scratch cards</td>
<td>138,702</td>
<td>4.3</td>
</tr>
<tr>
<td>E-instants and other digital games</td>
<td>275,93</td>
<td>8.5</td>
</tr>
<tr>
<td>Slot machines</td>
<td>821,842</td>
<td>25.4</td>
</tr>
<tr>
<td>Fixed odds betting games</td>
<td>379,861</td>
<td>11.8</td>
</tr>
<tr>
<td>Parimutuel betting games</td>
<td>108,919</td>
<td>3.4</td>
</tr>
<tr>
<td>Football pools</td>
<td>76,936</td>
<td>2.4</td>
</tr>
<tr>
<td>Toto games</td>
<td>101,367</td>
<td>3.1</td>
</tr>
<tr>
<td>Other toto games</td>
<td>130,595</td>
<td>4</td>
</tr>
<tr>
<td>Table games*</td>
<td>41,855</td>
<td>1.3</td>
</tr>
<tr>
<td>GAME GROUPS TOTAL</td>
<td>3,230,858</td>
<td>100</td>
</tr>
</tbody>
</table>

*For slot machines and table games with personal draws, the turnover is reported by deducting the prizes paid out.
9.1 GROSS GAMBLING REVENUE

The best way of describing gambling expenditure is the Gross Gambling Revenue (GGR), which means the stakes from which the winnings paid to gamblers have been deducted (see Table 9i). Game sales, on the other hand, refer to all amounts relevant to the sales of gambling services, of which the share indicated by each game’s return rate specified in a Government Decree is returned to the gamblers, potentially for replay. In the model of three gambling operators, the winnings returned to the gamblers were the following:

- Depending on the game, Veikkaus Oy paid out 40–95% of the stakes.
- On average, Finland’s Slot Machine Association paid out 70–99.9% of the total turnover accumulated from the stakes in a calendar year.
- Depending on the game, Fintoto Oy paid out 65–90% of the stakes.

Table 9b examines the trends in the monopoly operators’ gross gambling revenue over ten years.

**Table 9b. Gross gambling revenue of monopoly operators in 2006–2016**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>RAY [EUR million]</td>
<td>656</td>
<td>652</td>
<td>658</td>
<td>649</td>
<td>673</td>
<td>737</td>
<td>773</td>
<td>790</td>
<td>775</td>
<td>795</td>
<td>808</td>
</tr>
<tr>
<td>Veikkaus [EUR million]</td>
<td>659</td>
<td>678</td>
<td>720</td>
<td>767</td>
<td>802</td>
<td>832</td>
<td>826</td>
<td>836</td>
<td>863</td>
<td>885</td>
<td>918</td>
</tr>
<tr>
<td>Fintoto [EUR million]</td>
<td>53</td>
<td>55</td>
<td>55</td>
<td>53</td>
<td>50</td>
<td>51</td>
<td>68</td>
<td>68</td>
<td>63</td>
<td>63</td>
<td>64</td>
</tr>
<tr>
<td>Total [EUR million]</td>
<td>1,369</td>
<td>1,385</td>
<td>1,433</td>
<td>1,468</td>
<td>1,525</td>
<td>1,667</td>
<td>1,701</td>
<td>1,743</td>
<td>1,790</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>RAY *</td>
<td>47.9</td>
<td>47</td>
<td>45.9</td>
<td>44.2</td>
<td>44.1</td>
<td>45.5</td>
<td>46.4</td>
<td>46.6</td>
<td>45.5</td>
<td>45.6</td>
<td>45.1</td>
</tr>
<tr>
<td>Veikkaus *</td>
<td>48.2</td>
<td>49</td>
<td>50.2</td>
<td>52.2</td>
<td>52.6</td>
<td>51.3</td>
<td>49.5</td>
<td>49.4</td>
<td>50.7</td>
<td>50.8</td>
<td>51.3</td>
</tr>
<tr>
<td>Fintoto *</td>
<td>3.9</td>
<td>4</td>
<td>3.8</td>
<td>3.6</td>
<td>3.3</td>
<td>3.2</td>
<td>4.1</td>
<td>4</td>
<td>3.7</td>
<td>3.6</td>
<td>3.6</td>
</tr>
</tbody>
</table>

* percentage value
9.2 GAMBLING PROFITS

In 2016, the total profits of Veikkaus, Finland’s Slot Machine Association and Fintoto were EUR 1,031.8 million, which was entered in the state budget and distributed as grants to beneficiaries and other uses. The profits had increased by a total of EUR 39.8 million (+4%) compared to the year before. The gambling operators paid a total of EUR 214.7 million to the central government as lotteries tax. They also paid a total of EUR 172.7 million as outlet fees to their partners selling gambling products on their premises.

In 2016, the total amount of gambling operators’ profits shown as revenue in the state budget had increased by EUR 47.3 million (+3.9%) compared to the year before. Following the merger of the gambling operators, the proceeds are expected to remain at similar levels as in previous years. The stage budget for 2017 proposes that EUR 1,033.7 million be distributed to the beneficiaries of Veikkaus Oy.

**Table 9c. Gambling operators’ key financial figures in 2015–2016, EUR million**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>TURNOVER</td>
<td>3,120.7</td>
<td>3,247.7</td>
<td>127.0</td>
</tr>
<tr>
<td>GROSS GAMBLING REVENUE</td>
<td>1,743.9</td>
<td>1,790.8</td>
<td>46.9</td>
</tr>
<tr>
<td>Gross gambling revenue increase %</td>
<td></td>
<td></td>
<td>2.7%</td>
</tr>
<tr>
<td>Lotteries tax and authorities’ expenses</td>
<td>217.8</td>
<td>221.0</td>
<td>3.2</td>
</tr>
<tr>
<td>Sales fees</td>
<td>181.9</td>
<td>172.7</td>
<td>-9.1</td>
</tr>
<tr>
<td>Operating expenses</td>
<td>312.1</td>
<td>326.1</td>
<td>14.0</td>
</tr>
<tr>
<td>Integration expenses</td>
<td>0.0</td>
<td>5.6</td>
<td>5.6</td>
</tr>
<tr>
<td>Depreciations</td>
<td>45.9</td>
<td>43.5</td>
<td>-2.4</td>
</tr>
<tr>
<td>Other returns</td>
<td>5.0</td>
<td>9.8</td>
<td>4.8</td>
</tr>
<tr>
<td>OPERATING PROFIT</td>
<td>991.3</td>
<td>1,031.6</td>
<td>40.3</td>
</tr>
<tr>
<td>EARNINGS</td>
<td>991.9</td>
<td>1,031.8</td>
<td>39.9</td>
</tr>
<tr>
<td>Change in earnings %</td>
<td></td>
<td></td>
<td>4.0%</td>
</tr>
<tr>
<td>Proportion of expenses to gross %</td>
<td>30.7%</td>
<td>30.1%</td>
<td></td>
</tr>
</tbody>
</table>

According to the annual report, Veikkaus Oy’s turnover (including all the game groups) was EUR 3,230,858. Of the turnover, 58% came from the retail sales network and 42% from the digital channels. The total Finnish gambling market was about EUR 1,978 million in terms of gross gambling revenue in 2017. Veikkaus Oy’s share of the total market was about 90% [2].
9.3 USE AND DISTRIBUTION OF GAMBLING PROCEEDS

The basic principle of the Lotteries Act is that the proceeds from gambling are used for purposes of public interest. However, financing public services or public interest activities cannot, and from the perspective of European Union law must not, be the main purpose of maintaining a gambling system based on monopoly; it can only be an incidental beneficial consequence of the gambling system.

Merging the gambling operations of the three companies did not affect the purposes for which the proceeds are used. The reformed Lotteries Act contains provisions on the distribution of the proceeds for different purposes. Of Veikkaus Oy’s proceeds, 53% are used to promote sports and physical education, science, arts and youth work, 43% to promote health and social welfare, and 4% to promote horse breeding and equestrian sports. Decisions on grants are made by the Ministry of Education and Culture, the Ministry of Social Affairs and Health and the Ministry of Agriculture and Forestry, each in their own administrative branch.

9.3.1 Ministry of Education and Culture grants

The decisions on distributing central government transfers and grants out of Veikkaus Oy’s proceeds to promote sports and physical education, science, arts, and youth work are made by the Ministry of Education and Culture. In the financing of sports and youth work, proceeds from gambling have represented and continue to represent a greater share than in arts and science. The practices related to the grants and transfers vary within the ministry and the administrative branch.

Veikkaus Oy’s proceeds are distributed as follows:
1) 25% to promote sports and physical education
2) 17.5% to promote science
3) 38.5% to promote arts
4) 9% to promote youth work
5) 10% is granted for purposes cited above in a manner to be decided in detail in the annual state budget, mainly following the proportions laid down in the Lotteries Act.
TABLE 9d. The distribution of proceeds from gambling within the remit of the Ministry of Education and Culture, EUR million

<table>
<thead>
<tr>
<th></th>
<th>2015</th>
<th>2016</th>
<th>2017(^5)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Science</td>
<td>102.2</td>
<td>103.4</td>
<td>104.4</td>
</tr>
<tr>
<td>Arts</td>
<td>236.9</td>
<td>233.3</td>
<td>233.6</td>
</tr>
<tr>
<td>Sports</td>
<td>148.0</td>
<td>147.6</td>
<td>154.1</td>
</tr>
<tr>
<td>Youth</td>
<td>53.0</td>
<td>53.1</td>
<td>53.6</td>
</tr>
<tr>
<td>Total</td>
<td>540.1</td>
<td>537.4</td>
<td>545.7</td>
</tr>
</tbody>
</table>

9.3.2 Ministry of Social Affairs and Health grants

Decisions on grants aimed to promote health and social welfare are made by the Ministry of Social Affairs and Health. Grants have been made available for approximately 800 associations and foundations annually. The grants are prepared, paid out, monitored and supervised by the Funding Centre for Social Welfare and Health Organisations (STEA), which has been operating in conjunction with the Ministry of Social Affairs and Health since the beginning of 2017 following the Lotteries Act reform. STEA is an autonomous state aid authority. Its duties were previously discharged by the grant division of Finland’s Slot Machine Association.

The proceeds intended for promoting health and social welfare are spent on granting aid for legally competent public utility associations and foundations. See the following Tables (9e, 9f) for the amounts and allocation of grants from slot machine proceeds by type of grant and target area based on grant policies in 2015–2017.

TABLE 9e. Grants from slot machine proceeds by type of grant in 2015–2017, EUR million

<table>
<thead>
<tr>
<th>Grant type</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>General grants</td>
<td>61.0</td>
<td>63.7</td>
<td>65.6</td>
</tr>
<tr>
<td>Targeted operational grants</td>
<td>147.0</td>
<td>156.5</td>
<td>168.2</td>
</tr>
<tr>
<td>Investment grants</td>
<td>31.0</td>
<td>26.2</td>
<td>16.5</td>
</tr>
<tr>
<td>Project grants</td>
<td>70.3</td>
<td>68.9</td>
<td>67.3</td>
</tr>
<tr>
<td>Total</td>
<td>309.3</td>
<td>315.3</td>
<td>317.6</td>
</tr>
</tbody>
</table>

\(^5\) Budget proposal (from 2017, proceeds from gambling).
The proceeds intended for promoting health and social welfare can also be spent on reimbursements, costs and expenses referred to in section 5 of the Veterans’ Rehabilitation Act (1184/1988), section 8 of the Act on Rehabilitation for Persons Who Served in Specified Duties in Wartime (1039/1997) and section 6d of the Military Injuries Act (404/1948), and on covering STEA’s expenditure.

**Table 9f. Slot machine grants by target area in 2015–2017, EUR million**

<table>
<thead>
<tr>
<th>Target area</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>NGO operating capabilities and basic funding</td>
<td>113.2</td>
<td>113.0</td>
<td>114.9</td>
</tr>
<tr>
<td>Housing for special groups</td>
<td>35.1</td>
<td>31.6</td>
<td>22.3</td>
</tr>
<tr>
<td>Health and functional capacity</td>
<td>71.9</td>
<td>72.9</td>
<td>76.0</td>
</tr>
<tr>
<td>Crisis assistance and every-day safety and security</td>
<td>21.7</td>
<td>24.6</td>
<td>24.7</td>
</tr>
<tr>
<td>Communality and opportunities for participation</td>
<td>52.2</td>
<td>55.5</td>
<td>59.5</td>
</tr>
<tr>
<td>Inclusion in the labour market</td>
<td>15.3</td>
<td>17.8</td>
<td>20.2</td>
</tr>
<tr>
<td>Total</td>
<td>309.3</td>
<td>315.3</td>
<td>317.6</td>
</tr>
</tbody>
</table>

**Table 9g. Finland’s Slot Machine Association’s proceeds allocated to the rehabilitation and care of war invalids and front veterans in 2015–2017**

<table>
<thead>
<tr>
<th>Year</th>
<th>EUR million</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>117.0</td>
</tr>
<tr>
<td>2016</td>
<td>111.5</td>
</tr>
<tr>
<td>2017</td>
<td>128.2</td>
</tr>
</tbody>
</table>

### 9.3.3 Reform of the Lotteries Act and the undivided funds of Finland’s Slot Machine Association

Under the reformed Lotteries Act, appropriations that are expected to correspond to Veikkaus Oy’s proceeds and funds that return for redistribution in the relevant year are annually included in the state budget. Previously, the proceeds of Finland’s Slot Machine Association indicated in the organisation’s latest approved financial statements were distributed.
Following the Lotteries Act reform, the Ministry of Social Affairs and Health shall in the future distribute not only Veikkaus Oy's proceeds but also undistributed Finland's Slot Machine Association funds during a ten-year transition period. This represents an imputed accumulation of proceeds amounting to some EUR 500 million. In February 2017, the Ministry of Social Affairs and Health launched an additional application round for three new grant programmes to be financed from these undistributed funds. The duration of the programmes is 3.5 years, and an estimated EUR 36–40 million of undistributed funds will be allocated to them.

9.3.4 Ministry of Agriculture and Forestry grants

The decisions on distributing Veikkaus Oy's proceeds as grants for promoting horse breeding and equestrian sports are made by the Ministry of Agriculture and Forestry. Under section 17 of the Lotteries Act, at minimum 95% of the proceeds intended for promoting horse breeding and equestrian sports shall be allocated to the central organisation of horse breeders (Suomen Hippos) and its member organisations. The central organisation submits a proposal to the Ministry of Agriculture and Forestry on the annual distribution of grants to different beneficiaries and purposes.

In 2017, the majority of the proceeds was allocated to horse owners through central and regional race courses for prizes and as general operational support. It was estimated that Veikkaus Oy’s proceeds allocated to promoting horse breeding and equestrian sports would amount to a total of EUR 40.1 million in 2017. EUR 32.8 million for the accounting period of 2016 and EUR 30.8 million for the preceding accounting period were entered as revenue in the state budget by Fintoto Oy for promoting horse breeding and equestrian sports. These figures include the proportion allocated to the Ministry of Agriculture and Forestry and paid to Suomen Hippos.

9.4 EXPENDITURE ON GAMBLING ABROAD

International comparisons of gambling expenditure have proven difficult, as some of the actors use sales figures, while others indicate gross gambling revenues in their reports. The total gambling expenditure can be divided into recorded and unrecorded spending in the statistics. The recorded spending in Finland can be obtained accurately from the gambling operators’ statistics. In addition, survey data and various types of data associated with international monetary transactions, which allow examinations of online gambling volumes directed abroad, must be used to assess the citizens’ total spending.

It is estimated that the amount spent on games offered by operators outside the country was EUR 170 million in 2016. This accounts for almost 9% of the Finnish
gambling market. Since 2006, the volume of gambling directed to games operated from abroad has increased by more than 40% in Euro amounts. When comparing gambling directed abroad to the gross gambling revenue produced by the Finnish monopoly system, however, the relative share of the former has increased significantly less over the ten-year period, as the gross gambling revenue of the Finnish monopoly system has also increased by over 30% during this period.

It is estimated that since 2008, the relative share of games operated by actors outside the country has declined rather strongly. There has also been a reduction in Euro amounts: the estimated value of gambling directed abroad in 2011 (117 million) is approximately 18% less than the estimate for 2008 (138 million). Several factors which cannot be discussed exhaustively in this context have affected the fluctuations in these figures. Some of the key factors, however, are likely to be the opening of Finland’s Slot Machine Association’s online casino in 2010 and the decline of the online poker boom, which had lasted for some years, around 2010.

**Table 9h. Annual value of gambling directed abroad (estimate) 2006–2016**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Gross gambling revenue [EUR million]</td>
<td>1,369</td>
<td>1,385</td>
<td>1,433</td>
<td>1,469</td>
<td>1,525</td>
<td>1,621</td>
<td>1,668</td>
<td>1,694</td>
<td>1,701</td>
<td>1,743</td>
<td>1,790</td>
</tr>
<tr>
<td>Euros gambled abroad (incl. PAF) (million)</td>
<td>119</td>
<td>126</td>
<td>138</td>
<td>122</td>
<td>122</td>
<td>117</td>
<td>122</td>
<td>133</td>
<td>138</td>
<td>139</td>
<td>170</td>
</tr>
<tr>
<td>Of the Finnish gambling market (%)</td>
<td>8.7</td>
<td>9.1</td>
<td>9.6</td>
<td>8.3</td>
<td>7.3</td>
<td>7.2</td>
<td>7.3</td>
<td>7.9</td>
<td>8.1</td>
<td>8.5</td>
<td>8.4</td>
</tr>
</tbody>
</table>

---

6 Veikkaus Oy’s estimate of the amounts spent on gambling directed abroad is based on such sources as the published revenue data, estimates produced by H2 Gambling Capital and other third-party experts, surveys, online transaction data (www.alexa.com), news in the sector and other individual sources.
**FIGURE 9i.** Estimate of amounts gambled abroad (including PAF, % of the Finnish gambling market)\(^7\)

**FIGURE 9j.** Gross gambling revenues of the Finnish gambling system, EUR million

---

\(^7\) Based on the aforementioned estimate produced by Veikkaus Oy.
## References


 CHAPTER 10.

Gambling-related problems and harms

- The results of the population survey of 2015 indicate that 3.3% of the respondents had a gambling problem.

- The prevalence of problem gambling was highest in Ostrobothnia, Kymenlaakso, South Karelia, Kainuu and Lapland.

- Women’s gambling problems showed an increase between 2007 and 2015.

- The most gambling-related harms affecting significant others were experienced when the gambler was the respondent’s child or partner.
Instruments measuring problem gambling have traditionally been used to examine the negative consequences of gambling. These instruments mainly evaluate the respondent’s gambling behaviour and its financial consequences. In recent years, the focus of examining the potential consequences of gambling has shifted from charting the prevalence of problem gambling towards a more extensive analysis of gambling-related harms. The harms caused by gambling can be divided into financial harms, relationship harms, harms associated with work or studies, health harms, emotional harms and other negative consequences, including criminal activities and child neglect [1,2]. Gambling-related harms may be mild or severe and of a short or long term, and they may affect gamblers, significant others and even society in a wider sense.

10.1 PREVALENCE OF PROBLEM GAMBLING IN FINLAND

In population surveys conducted to study gambling in Finland, the South Oaks Gambling Screen (SOGS) has been the primary instrument used, which is globally one of the most commonly used instrument for examining the prevalence of problem gambling. The SOGS contains 20 questions, and the scores range from 0 to 20. Using the SOGS, a gambler can be classified as having no problem with gambling (0 points), being a at-risk gambler (1–2 points), being a problem gambler (3–4 points), and being a probable pathological gambler (≥ 5 points). Since 2011, the prevalence of problem gambling in Finland has been examined using only a 12-month time frame.

The population survey conducted in 2015 indicates that 3.3% of the respondents had a gambling problem (SOGS ≥ 3 points), while 15% were at-risk gamblers (Figure 10a). Problem gambling was 1.8 percentage points more common among men than women. The prevalence was the highest in the age group 18–24 (6%), but also high in the age group 25–34 (3.7%).

**FIGURE 10a. Prevalence of problem gambling in 2015 (%)**
The prevalence of problem gambling in the age group 15–74 was more or less at the same level in 2015 as in 2007 (Figure 10b). During this period, however, the prevalence of problem gambling has decreased among men but increased among women. The prevalence of at-risk gambling among women also increased between 2011 and 2015.

**FIGURE 10b. Prevalence of problem gambling in 2007, 2011 and 2015 (SOGS ≥ 3, %)**

The prevalence of problem gambling among minors decreased between 2007 (10.7%) and 2011 (3.7%). In 2015, there had been a further decline in problem gambling affecting minors, and the prevalence of problem gambling in the age group 15–17 was only in the range of one percentage point in that year.

There are regional variations in the prevalence of problem gambling. The Finnish gambling population survey indicates that the prevalence of gambling problems was the highest in Ostrobothnia, Central Ostrobothnia, South Ostrobothnia, Kymenlaakso and South Karelia as well as in North Ostrobothnia, Kainuu and Lapland. The Regional Health and Wellbeing Study (ATH) indicates that the prevalence of subjectively experienced problem gambling was the highest in Lapland, Kainuu and Kymenlaakso, while it was also high in Kanta-Häme. The prevalence of problem gambling was the lowest in the region of Central Finland.
10.2 GAMBLING PROBLEMS OF SIGNIFICANT OTHERS

Since 2007, the Finnish gambling population survey has contained a question asking if a person close to the respondent (father, mother, brother or sister, grandparent(s), partner, own child or children or close friend) had had a gambling problem. In 2015, one respondent out of five knew such a person. This corresponds to approximately 727,000 Finnish people. Most commonly, the gambling problem affected a close friend (13%). The family member with a gambling problem typically was the respondent’s brother or sister (3%), father (2%) or partner (2%). Men were more likely to have close friends with a gambling problem. Similarly, the share of respondents with a family member who had a gambling problem was greater for women than for men.

**FIGURE 10c.** The proportion of significant others of problem gamblers in 2007, 2011 and 2015 (%)

10.3 GAMBLING-RELATED HARMs TO GAMBLERS AND THEIR SIGNIFICANT OTHERS

10.3.1 Gamblers

Rather than only affecting people who gamble frequently or a lot, gambling harms may also affect persons who gamble less often. In 2015, gambling harms were examined using individual items of instruments measuring gambling problems. In this analysis, the most typical gambling-related harm experienced by gamblers was associated with poor control of their gambling. The gambler had played more than they had originally intended (14%). The second most common harm was associated with chasing losses: the gambler had returned to gambling on another day to try to win back the money they had lost (8%). Gamblers also experienced feelings of guilt (6%).
Gambling Harms Survey that incorporated the views of both the population at large and those who had sought help for their gambling problem was conducted in Finland in 2017 [3,4]. The population survey had 7,186 respondents aged 18 or over from Uusimaa, Pirkanmaa and Kymenlaakso. Additionally, 119 clients who had contacted Gambling Clinic in Helsinki to get help for their problem gambling participated in the study. This was the first gambling survey with a more extensive focus on harms in Europe.

Of those who responded to the population survey, 11% felt that gambling had caused harm [1,2] in their lives. This means approximately 191,000 people living in Uusimaa, Pirkanmaa or Kymenlaakso. The most typical gambling-related harms were financial (8%) and emotional or psychological (6%). When looking at the amount of harms, men experienced more harms of all types than women. As a generalisation, the older the respondents were, the less harms they experienced. No obvious regional differences were found in the amount of gambling-related harms.

**FIGURE 10d.** Respondents who experienced at least one gambling-related harm in Uusimaa, Pirkanmaa or Kymenlaakso in 2016 (%)

The clients of Gambling Clinic had experienced a great number of different gambling harms, including emotional harms (88%), financial harms (87%), health harms (87%) and relationship harms (81%). On average, Gambling Clinic’s clients had experienced 24 harms in 2016. Almost one half (45%) had become indebted or been driven into a vicious circle of debt. Approximately one out of three (34%) Gambling Clinic’s clients had experienced 0–19 harms, one quarter (26%) 20–29 harms and the remaining 40% had experienced 30 or more harms. No differences between the genders and age groups were found when looking at the amount of gambling-related harm. On the other hand, when the harms were examined by harm dimension, men had experienced more harms related to work or studies than women.
10.3.2 Significant others

In 2015, the Finnish gambling population survey included for the first time a question about harms that the gambling problem of a significant other had caused to the respondents. 59% of the respondents with a significant other who had a gambling problem had experienced at least one harm that affected them personally. Women reported more gambling harms of this type than men. The highest number of gambling-related harms were experienced if the gambler was the respondent’s child or partner (Figure 10f). On the other hand, the gambling problem of a close friend had also created a significant amount of harms.
Typically, the gambling problem of a significant other had caused concern over the wellbeing and health of the respondent’s child or other significant other (45%), emotional stress (35%) and problems with an intimate relationship (10%) and other interpersonal relationships (19%) (Table 10g).
### TABLE 10g. Harms caused by a significant other’s gambling problem in 2015; respondents with a significant other who had a gambling problem (%)

<table>
<thead>
<tr>
<th>Harm dimension</th>
<th>Harms caused</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emotional or psychological harms</td>
<td>Emotional distress, such as stress, restlessness, anxiety, depression, hopelessness or guilt</td>
<td>35</td>
</tr>
<tr>
<td>Relationship harms</td>
<td>Problems in a relationship, such as arguments, distrust, divorce or separation</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>Other interpersonal relationship problems, such as arguments, isolation, distancing yourself from friends</td>
<td>19</td>
</tr>
<tr>
<td>Emotional or psychological harms</td>
<td>Worry about health or wellbeing of own child</td>
<td>7</td>
</tr>
<tr>
<td></td>
<td>Worry about health or wellbeing of other close ones</td>
<td>38</td>
</tr>
<tr>
<td>Financial harms</td>
<td>Eviction or threat of being evicted</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Other financial problems, such as payment issues, loans related to gambling, loss of financial credibility</td>
<td>10</td>
</tr>
<tr>
<td>Health harms</td>
<td>Health impacts, such as sleep problems, headaches, backaches or stomachaches</td>
<td>7</td>
</tr>
<tr>
<td>Other harms</td>
<td>Emotional violence, such as blackmailing, pressuring or intimidation</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Physical violence witnessed or being threatened</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Victim of some other type of crime, for example, theft or identity theft</td>
<td>7</td>
</tr>
</tbody>
</table>

### 10.4 GAMBLING HARMs AFFECTING SOCIETY

At societal level, gambling both creates benefits and causes harm. Gambling proceeds have significantly benefited Finnish society for decades – NGOs, in particular, have been able to finance their activities through grants paid out of gambling proceeds (Chapter 9) [5]. The societal harms caused by gambling are associated with health and wellbeing, social relations, the economy, work and studies as well as legislation and justice [1,2,6,7].

Society incurs social and health care costs due to different health, mental health and social harms. The harms related to health and wellbeing stem directly from problem gambling and comorbidities, including hypertension, sleeplessness, depression and other affective disorders, substance abuse problems, use of tobacco products as well as neglect of treatment and medication. The most serious health-related problems include self-harm and suicide attempts. Examples of social harms relevant to problem gambling are various problems affecting an intimate partner relationship and family life (including intimate partner violence and child neglect), social isolation of problem gamblers, homelessness and social exclusion [1,6,8,9].
Gambling may also cause other economic harms and costs to society than those associated with health and welfare. Gamblers’ indebtedness and other financial problems may lead to reliance on social welfare and the use of financial and debt advisory services (Chapter 12). Indebtedness and loss of income may also be associated with the threat of homelessness. Efforts to prevent and reduce problem gambling (Chapter 11), treatment and education related to gambling also create costs at both the local and national level [6].

Harms affecting employment and studies are linked to gamblers’ ability to work, productivity, unemployment, labour force training as well as ability to study and coping with studies. Problem gamblers may fail to show up at work, or cope with their duties poorly because their gambling is out of control. Coping poorly with work duties may reduce productivity from the employer’s perspective and result in dismissal. Both human and financial resources are required to train a new employee to replace a dismissed gambler. Problem gambling may take a toll on studying in the form of poor time management and financial problems (for example, spending a study loan on gambling) [1,2,6,8].

The societal harms may also manifest themselves at the level of legislation and the judicial system. They may include violent crime associated with gambling (e.g. assaults and robberies) and other offences (e.g. burglaries, car theft, embezzlement), costs incurred by companies other than gambling operators due to crime (e.g. in the form of embezzlement, theft, money laundering or usury) and costs associated with policing, trials and serving a sentence (e.g. a suspended or a custodial sentence) [6,8,9].

**TABLE 10h. Examples of gambling harms affecting society**

<table>
<thead>
<tr>
<th>Health and welfare harms</th>
<th>Problem gambling Health, mental health and social comorbidities Suicide</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social harms</td>
<td>Problems affecting an intimate partner relationship and family life Intimate partner violence Divorce Social isolation Homelessness Social exclusion</td>
</tr>
<tr>
<td>Financial harms</td>
<td>Financial problems Prevention and reduction of gambling problems, treatment services and education</td>
</tr>
<tr>
<td>Harms related to work and studies</td>
<td>Reduced ability to work Unemployment Reduced ability to study</td>
</tr>
<tr>
<td>Harms related to legislation and the judicial system</td>
<td>Crime Punishments Policing and trials</td>
</tr>
</tbody>
</table>
References


Prevention of gambling harms

- The principal objectives of Finnish gambling policy are preventing and reducing gambling harms.
- The work to evaluate the harms caused by new gambling products supports the objective of the Lotteries Act and the European Commission of efficiently preventing gambling problems.
- A responsible approach is required in the offer and marketing of gambling, supervision of the age limit and design of tools intended for controlling gambling.
- The Act on Organising Alcohol, Tobacco, Drugs and Gambling Prevention (532/2015) strives to reduce smoking and the harms caused by alcohol, drugs and gambling.
- The Action Plan on Alcohol, Tobacco, Drugs and Gambling specifies the priorities of carrying out and developing the efforts to prevent gambling harms.
11.1 WHAT DO PREVENTION AND REDUCTION OF GAMBLING HARMs MEAN?

The prevention of gambling harms refers to all measures taken to prevent and reduce the harms that gambling causes to individuals, significant others and society. The measures target the demand for, availability and offer of gambling services. The demand can, for example, be influenced by using different means to provide citizens and professionals with more information about the risks associated with gambling. The availability of gambling can be regulated by restricting the number of games and outlets, outlet opening hours and the marketing of the games. When preparing game rules, the properties of the games and the potential risks associated with them should be accounted for when taking a stand on their marketing and, consequently, the offer of games [1]. The age limit of 18 set for gambling can also be classified as a way of restricting the availability of games. Regulating the availability of games has been assessed as the most efficient way of preventing and reducing gambling harms [2].

The prevention of gambling harms is divided into primary, secondary and tertiary prevention. The target group for primary prevention is the entire population. It takes the form of legislative measures that restrict the availability of games. Primary prevention also includes approving the game rules or evaluating risks as new games are launched. Secondary prevention targets risk groups. These may include minors, students, older persons and those who gamble a lot. The preventive measures should thus reach the population and gambler groups that are at a particular risk from gambling harms [3]. The target group for tertiary prevention is problem gamblers. At this stage, the aim is to stop the exacerbation or prolongation of problems. Examples of this preventive work are various treatment services and peer support groups for those suffering from gambling problems.

Preventing gambling harms has been set as the principal aim of Finnish gambling policy. This policy choice stresses the need to also approach decisions related to the gambling system as welfare and health policy issues [4]. Bodies striving to prevent and reduce gambling harms within the framework of the national gambling policy include the Ministry of the Interior, the Ministry of Social Affairs and Health, the National Institute for Health and Welfare, the National Police Board and Veikkaus Oy. Administratively, the responsibility for preventing gambling harms has been assigned to a number of actors. Overall responsibility for preventing gambling harms is assumed by the Ministry of Social Affairs and Health, which has assigned the practical implementation of prevention measures to the National Institute for Health and Welfare. The Institute studies gambling behaviour and harms as well as the societal regulation of gambling activities and develops the system for preventing and treating gambling harms [5].
11.2 EVALUATION OF HARMS

In autumn 2016, an independent working group operating in conjunction with the Ministry of Social Affairs and Health was launched. The group evaluates the harmfulness of games, and expert statements can be requested from it if necessary. The work of this evaluation group consisting of a number of different experts supports the objectives of the Lotteries Act and the European Commission related to assessing the harmfulness of games in advance in order to facilitate the efficient prevention of gambling problems. As part of its supervisory activities, the National Police Board pays attention to compliance with game rules and the compatibility of new games with the forms of operation permitted under the Lotteries Act. If the Lotteries Act contains no provisions on a certain game type, this game may not be offered in Finland.

What information is the evaluation of gambling harms based on?
Various proactive measures aiming to prevent harms can also be used in connection with gambling operation. For example, the risks can be considerably reduced by using measures that affect the gambling environment and the properties and sales of games, as well as by linking different tools for the customers to keep their gambling in control. However, it is possible that preventive solutions work in different ways for different games and their distribution channels. So far, there is no individual measurement method that would provide sufficient information on the risks associated with a new game or a modification of rules. The evaluation of harms should be based on a broader situational picture, making it possible to address better the relationship between protective and risk factors in gambling activities.

Thanks to research findings related to gambling and technological advancement – in particular, online gambling and the identification of gamblers – the links between decisions concerning games and gambling operation on the one hand and problem gambling and gambling harms on the other can be evaluated better. The objective of studying and evaluating the risks is to identify mechanisms that result in problem gambling. Increased knowledge about the risks will significantly improve the possibilities of controlling them and preventing gambling harms also in a wider sense.

Risk assessment
Assessing the risks associated with gambling products in advance is difficult, as it is based on measuring the technical properties of the products and interpreting this data. Risk profiling of games based on certain properties has shown that these properties have clear links to certain modes of gambling. In general, the characteristics that exacerbate the risk of losing control of gambling or the risk of problem gambling can be identified relatively well. Research literature on the properties of gambling products, which draws on survey results, treatment facility data, statistics of gambling companies
and different research designs, has shown that properties relevant to the speed of play and its reward mechanisms play a key role in creating a risk. Measurements developed for profiling games can be used, but the information provided by the profiling exercise is not sufficient to base a reliable advance evaluation on.

An advance assessment of the risk presented by a gambling product should include
1. a technical measurement of game properties that create risks,
2. an expert evaluation of game properties that create risks,
3. an examination of statistics on spending and harms associated with games similar to the game to be evaluated, and
4. gathering of suitable research data, information from support services and any other data.

The evaluation of harms seeks to answer many types of questions: What modes of gambling is the new gambling product or modification in gambling operation likely to promote? To what extent could this change result in harmful gambling? How could this change affect the behaviour of different groups of gamblers? When analysing harmful gambling, an effort should also be made to assess the extent to which the change will increase problem gambling or trigger new types of problem gambling.

11.3 RESPONSIBLE GAMBLING AND ITS EFFECTIVENESS

Finland has to a great extent relied on gambling operators’ self-regulation and compliance with the obligations imposed on them. The central government has required the gambling operators to engage in corporate social responsibility planning and mentality, especially when it comes to the offer and marketing of games, supervision of the age limit and the offer of tools for controlling gambling [6]. Under the amended Lotteries Act that entered into force at the beginning of 2017, Veikkaus Oy shall undertake to prevent and reduce the financial, social and health harms caused by gambling. In addition to the Lotteries Act, the prevention of gambling harms is manifested in the decrees issued by the Government and the Ministry of the Interior as provisions on the highest stakes and payout rates of gambling products, as well as the daily limits of losses set for specific games.

Evaluation of products in terms of responsible gambling

Veikkaus Oy strives to prevent gambling harms by various means. A responsible gambling evaluation is carried out on all product ideas. This evaluation developed by the prior gambling organisations themselves produces ethical assessments concerning the harmfulness of games that are under development. The responsible gambling tool comprises nine areas with detailed questions to measure any addictive features that
a product idea may have. These areas are 1) gaming elements, 2) risk of financial losses, 3) structure of stakes and winnings, 4) role of skill, knowledge, randomness and rules, 5) attractiveness of the game and its environment, 6) additional attractions, 7) social characteristics, 8) availability, and 9) marketing.

**Identification of at-risk and problem gamblers**
The prior gambling organisations used two models in an attempt to identify risk and problem gamblers. Veikkaus developed a Responsible customership model striving to identify gamblers with atypical behaviours. This model is a tool for monthly monitoring that is used internally in Veikkaus Oy’s business and corporate social responsibility unit. Finland’s Slot Machine Association used a model for identifying problem gamblers (including probable problem gamblers, potential problem gamblers and gamblers who were unlikely to have problems). This model allowed the organisation to analyse gamblers’ online casino gambling over the preceding three months. An effort was made to identify potential problem gamblers on the basis of data on stake levels and game rounds. Veikkaus Oy believes that a combination of these two models will enable more efficient identification of at-risk gamblers.

**Measures and tools offered by Veikkaus Oy**
In addition to the age limit for gambling, all Veikkaus Oy’s gambling products now have a protective age limit. This means that the company has issued instructions to check the ages of all gamblers who appear to be under 23. Veikkaus Oy is training outlet staff to ask gamblers for their IDs and to prevent minors from gambling.

Gamblers can become registered on Veikkaus Oy’s website and set up personal gaming accounts. The registration process makes it possible to identify gamblers, and the gamblers can set limits to their gambling, self-exclude from gambling (Table 11a) and monitor their gambling on Veikkaus Oy’s website by checking the summary of their gaming account.

The previously used responsible gambling actions were based on either regulation or the gambling organisations’ own operating model. Rather than continuing to rely on voluntary actions, Decree 2017/1424 puts responsible gambling actions within the scope of considerably more extensive regulation (entry into force on 12 December 2017).
TABLE 11a. Responsible gambling measures and tools

<table>
<thead>
<tr>
<th>Responsible gambling measures and tools in different gambling venues</th>
<th>Time and amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ban on entering game arcades and the casino in Helsinki</td>
<td>Gamblers contact the staff to request a ban, which enters into force at once. The ban is valid for at least 3 and at most 12 months.</td>
</tr>
<tr>
<td>Limitation on money transfer (from 12 December 2017)</td>
<td>Gamblers must set a daily and monthly limit on transferring money from their bank account to the gaming account in Veikkaus Oy’s service.</td>
</tr>
<tr>
<td>Ban on transferring money to a gaming account at night</td>
<td>Gamblers cannot transfer money from their bank account to their gaming account between midnight and 6 a.m.</td>
</tr>
<tr>
<td>Blocking online gambling (from 12 December 2017)</td>
<td>Gamblers may self-exclude from online gambling in Veikkaus Oy’s services. The self-exclusion may be set on particular games or game groups. Gamblers may also self-exclude from all online gambling.</td>
</tr>
<tr>
<td>“Panic button” (from 12 December 2017)</td>
<td>By pressing this button, gamblers can immediately put a stop to all gambling in Veikkaus Oy’s service until the end of the following day.</td>
</tr>
<tr>
<td>Daily monetary limits in Veikkaus Oy’s gambling service (until 11 December 2017)</td>
<td>The limit for online scratch cards, Syke and eBingo is EUR 100/day. The limit for Live-bet is EUR 600/day.</td>
</tr>
<tr>
<td>Loss limits in Veikkaus Oy’s service (until 11 December 2017)</td>
<td>Loss limit for casino and slot machine games is EUR 500/day.</td>
</tr>
<tr>
<td>Loss limits for fast-paced online games in Veikkaus Oy’s service (from 12 December 2017)</td>
<td>Gamblers must set themselves daily and monthly loss limits for fast-paced games in Veikkaus Oy’s service. In fast-paced games, the daily loss limit may not exceed EUR 1,000 and the monthly loss limit may not exceed EUR 2,000.</td>
</tr>
<tr>
<td>Maximum limit for gaming account balance (from 12 December 2017)</td>
<td>The gaming account balance may not exceed EUR 20,000.</td>
</tr>
<tr>
<td>Time counter on Veikkaus Oy’s service (from 12 December 2017)</td>
<td>Veikkaus Oy’s service feature a time counter, which informs gamblers at the maximum intervals of one hour about the time spent on gambling with a pop-up notification.</td>
</tr>
</tbody>
</table>

Research on effectiveness

International scientific evidence has been produced on how gambling restrictions affect gamblers’ ability to control their spending and the prevention of gambling harms. However, several studies have shown that gamblers rarely introduce voluntary restrictions. This is why mandatory restrictions must be considered a better option. A lot of research has also been conducted on self-exclusion. Scientific evidence has been obtained of their effectiveness. Evidence-based recommendations note that self-exclusions should last for an extensive period or at least for six months [7]. The fact that these studies were based on countries with licensing systems is a problem when assessing these findings, however. In these systems, it is easier for gamblers to evade self-imposed restrictions by going to the websites of different gambling operators or by gambling without being identified. The evasion of gambling restrictions is
not a particular problem in Finland, as the majority of Finnish people’s gambling expenditure is channelled to games offered by Veikkaus Oy. So far, there is little scientific evidence based on follow-up studies to prove the effectiveness of measures targeting the gamblers. Measures based on gambling behaviour, including providing gamblers with tailored feedback, could prove effective ways of preventing and reducing gambling harms in the future [8].

11.4 INTEGRATING THE PREVENTION OF GAMBLING HARMs IN PREVENTIVE SUBSTANCE ABUSE WORK

The Act on Organising Alcohol, Tobacco, Drugs and Gambling Prevention (532/2015), which entered into force in 2015, clarified the gambling operators’ responsibilities and the role of prevention in substance abuse work carried out by the municipalities. The Act addresses the reduction of harms caused by alcohol, drugs, gambling and smoking. It stresses the use of evidence-based operating models and extensive regional cooperation. To support the implementation of the act, an Action Plan on Alcohol, Tobacco, Drugs and Gambling [9] was created, which also specifies the priorities of the work to prevent gambling harms and its development.

In the National Institute for Health and Welfare’s work aiming to develop the prevention of gambling harms, the priorities of the action plan have taken the form of

- cooperation with municipalities to ensure that they have appropriate structures for preventive work in place
- production of material for disseminating information on gambling harms
- developing tools and a model for identifying risk gambling and gambling harms and providing brief counselling
- inclusion of gambling in the Pakka operating model and producing training programmes and tools relying on it
- taking the special features of local communities into account and producing suitable materials to support the work
- producing and organising training programmes that support staff competence.

The objective of the Pakka operating model [10] is to improve the efficiency of local supervision of the age limit for gambling and to spread awareness of gambling harms. The goals of preventive substance abuse work are reducing problem gambling among young people and adults, increasing the age at which gamblers start playing, and preventing regional and sub-regional gambling harms methodically in cooperation between different stakeholders. Some of the municipalities using the Pakka operating model have already integrated gambling in their activities, ensuring that the local working group on the offer of alcohol, drugs, tobacco and gambling includes a representative of the gambling operator. This work is goal-oriented, and measures aiming to prevent gambling harms are developed and organised together with local business actors and other stakeholders.
The supervision of the age limit for gambling in outlets has been tested through mystery shopping around Finland for several years [11]. In these tests, adolescents who were of age but looked younger attempted to play on slot machines, buy scratch cards and participate in pool games. As a rule, they have met with little difficulty in doing so, and they have not been asked about their age or requested to show their IDs. Pakka activities have thus striven to pay more attention to more effective supervision of compliance with the age limit locally.

In 2015, the Finnish Association for Substance Abuse Prevention launched a project titled Arpa aiming to improve competence related to identifying, assessing and preventing gambling harms. The project’s target groups are adult gamblers and professionals carrying out preventive substance abuse work. The Arpa project focuses on defining and identifying problem gambling, as this plays a key role in the work aiming to prevent gambling harms [12]. The project has also produced material on preventing gambling harms in the workplace [13].

The National Institute for Health and Welfare, the Finnish Association for Substance Abuse Prevention’s Arpa project, and the preventive substance abuse unit in the City of Vantaa launched in 2015 a cooperation project aiming to develop a suitable model for assessing gambling and providing brief counselling in health and social services, as well as training that would support the model’s introduction. This model was introduced in autumn 2016 following pilot training.

A three-year project titled ‘Four winds’ (Neljä tuulta) was launched in Päijät-Häme at the beginning of 2017. The objective of the project is to improve the efficiency and systematic nature of preventive work in the form of multidisciplinary activities in changing service structures. The Four winds operating model strives to reduce harms caused by alcohol, tobacco, drugs, gambling and intimate partner violence as well as to promote good mental health. Substance abuse, problem gambling, intimate partner violence and mental health problems are phenomena with common interfaces and features, and joint services to address these problems can thus be organised [14].

11.5 INFORMATION, TRAINING PROGRAMMES AND COMMUNICATIONS SUPPORTING THE PREVENTION OF GAMBLING HARMs

The National Institute for Health and Welfare’s support materials and training programmes offer tools for preventing gambling harms, identifying risks and providing early support. The support materials and training have been produced to provide more information about the harms associated with gambling. New support materials related to gambling and gambling harms have been produced for different target groups, and earlier publications have been updated. Online training courses have been put together to support competence in the prevention of gambling harms.

The support materials are intended for professionals who encounter gambling problems in their work, educators, as well as gamblers and significant others. They
were produced in cooperation with different organisations. Support materials are available in Finnish and Swedish:


Commissioned by the National Institute for Health and Welfare, the online training courses are coordinated by the Centre of Expertise on Social Welfare in Central Finland. The Pelihaittojen ehkäisy (Prevention of gambling harms) self-study materials are freely available online. Other courses are organised in cooperation with training organisations as part of the study module on Encountering gambling problems. Online courses that support the prevention of gambling harms include

- Prevention of gambling harms
- Prevention of gambling harms self-study material
- Internet and gambling problems and ability to study.

In addition to online courses, regional training and seminars have been organised regularly in cooperation by the National Institute for Health and Welfare, municipal actors, NGOs and experts by experience. The training has focused on gambling harms, assessing gambling and early support. Some 900 professionals have participated in the training in 2013–2016.
References


An overview of support, counselling and treatment services

- Seeking treatment for gambling problems is hindered by a variety of factors.
- Low-threshold support and advisory services help gamblers assess their situation and select suitable modes of action.
- Different services are available for treating problem gambling and gambling disorder.
- The competence of social welfare and health care professionals is built up by means of training and information materials.
- The upcoming health and social services reform is likely to affect the prevention initiatives and provision of treatment services for gamblers and their significant others.
12.1 GAMBLING DISORDER AND CHALLENGES TO SEEK HELP OR TREATMENT

Gambling disorder is a behavioural addiction in the same way as addiction to sex, compulsive exercise or excessive shopping. Compulsive gambling has many similarities with substance-related addictive disorders, including alcohol and other substance use disorders. Gambling disorder is associated with increased tolerance, withdrawal symptoms, relapses and neglect of duties in the same way as substance use disorders. Additionally, impulsiveness, experience seeking and low problem-solving skills are personality traits that are linked to gambling disorder [1].

Gambling disorder often occurs simultaneously with other issues such as mental health and substance use problems. Gambling disorder is often presenting with depression, anxiety and personality disorders as well as attention deficit and hyperactivity disorder [3]. Co-occurrence of multiple problems at the same time puts the individual under further stress and may make the problem more difficult to identify. What also hampers detection and identification of a problem is that problematic gambling does not exhibit tell-tale signs (smell of a cigarette or alcohol) and can be easy to hide, therefore it is called “a hidden addiction”.

Gamblers often seek treatment when their gambling problem has already caused significant harms to themselves or others. Seeking treatment as early as possible would, however, be vital for preventing and reducing the negative consequences of a gambling problem [4].

Primary services, including health centres, pupil and student health care, occupational health care and social welfare services play a key role in identifying and assessing possibly problematic gambling and its negative consequences and further referring those in need to treatment [5].

However, the threshold for seeking treatment may be high for a problem gambler. Barriers to seek help or treatment may be personal, associated with family and social relationships, a product of the gambling culture, cultural, or associated with the structure and content of the services. Personal barriers may include denying the problem, lack of initiative, the gambler’s belief in their ability to stop gambling without assistance, and negative feelings. Barriers related to family and social relationships may include concealing the problem (cf. fear of dissolution of an intimate partner relationship and loss of family) and the associated shame. Barriers arising from the gambling culture may include the general lenient attitudes towards gambling, failure to identify problem gambling and the gambler’s erroneous perceptions and beliefs about the value of money and the association between their skills and possibilities of winning. General cultural barriers could include the difficulty of admitting one’s own weakness, determination and willingness on coping with problems on your own (especially in men) and the fear of ending up with a peer group. Barriers related to the structure and content of services includes also lack of services available and experienced high threshold to seek help [6].
12.2 SUPPORT, INFORMATION AND COUNSELLING SERVICES

Access to support, information and counselling services has been improved considerably in Finland in the last ten years. Support and counselling services include professional guidance and counselling, self-help and peer support, which help gamblers assess their own situation and choose the options best suited for them. An effort has been made to provide services with as low threshold as possible, and anonymity [7]. The helpline, as well as, online services and practical tools to control gambling and related situations are available for problem gamblers and significant others. Peer support is also available through online chat rooms. Online support is a good addition to face-to-face services [8]. Peer group activities and support for problem gamblers and significant others are available in various locations in Finland.

Peluuri support service

Peluuri is part of the Peliklinikka services, offering low-threshold support, guidance and counselling services. Peluuri provides information about the prevention and treatment of gambling problems. Type of services consists of helpline conducted by professionals, and another help line ran by peers, the Peli poikki (Time to Fold) programme and various other online support and counselling services. Peluuri is a national organisation, and all its services are free. These services are provided by the Blue Ribbon Association (Sininauhaliitto) and A-Clinic Foundation, and the funding comes from Veikkaus Oy.

See Table 12a for details of calls regarding gambling problems received by the helpline. In the last three years, the number of calls concerning gamblers’ gambling problems has increased. In addition, to answering calls, the statistics on the helpline include outgoing calls made by Peluuri. In 2016, Peluuri reached out to 192 customers who had self-excluded themselves from gambling. With half of them the topic of discussion was gambling problems or how to control gambling, whereas the remaining half did not wish to talk about these issues [9].

**Table 12a**. Calls concerning gambling problems made to Peluuri in 2014–2016 and change in 2015–2016, %

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Gambling problem, total</td>
<td>1 183</td>
<td>1 263</td>
<td>1 316</td>
<td>4.2%</td>
</tr>
<tr>
<td>- gambler</td>
<td>792</td>
<td>869</td>
<td>951</td>
<td>9.4%</td>
</tr>
<tr>
<td>- significant others</td>
<td>348</td>
<td>353</td>
<td>336</td>
<td>-4.8%</td>
</tr>
<tr>
<td>- indirect client*</td>
<td>43</td>
<td>41</td>
<td>29</td>
<td>-29.3%</td>
</tr>
</tbody>
</table>

* Indirect clients are professionals or others interested in gambling harms
See Table 12b for a general description of the telephone and online services offered by Peluuri. All these services, excluding the Peli poikki (Time to Fold) programme, are intended for both gamblers and significant others. Peluuri applies a client-centered approach when providing guidance and counselling for the clients. This approach emphasises listening to the client with an empathic and non-judgemental manner following the framework of motivational interviewing [10].

Peluuri provides help and support both by professionals as well as a form of peer group chats. The helpline serves 1,200 to 1,400 gamblers, significant others and professionals every year. Approximately 70% of the gamblers contacting Peluuri are men, whereas some 80% of the persons close to a gambler are women [10].

Gamblers and significant others can also find support and advice in online chat rooms produced in cooperation with the A-Clinic Foundation’s AddictionLink services. Valtti is an open forum for gamblers operating at AddictionLink and can be accessed by clicking on a link on the Peluuri website. Hertta is a chat room intended for significant others maintained by AddictionLink, which can also be accessed from Peluuri’s website.

The Peli poikki (Time to Fold) programme is an eight-week online treatment programme with telephone support (weekly call from a therapist) financed by the National Institute for Health and Welfare. The participants complete assignments on their own and talk to a therapist on the telephone once a week. The programme is based on a cognitive-behavioural therapy’s framework combined and conducted with motivational interviewing spirit. The participants can also access peer support in the treatment programme’s chat room.

The Peluuri website also offers a PGSI test (Problem Gambling Severity Index), which gamblers can use to assess the severity of their potential gambling problem, and a BBGS test (Brief Biosocial Gambling Screen), by which gamblers can assess their gambling and their willingness to cut down.

**TABLE 12b. Peluuri helpline and online services**

<table>
<thead>
<tr>
<th>Type of service</th>
<th>Content of service</th>
</tr>
</thead>
<tbody>
<tr>
<td>Helpline</td>
<td>A helpline that provides information, support and instructions. Calls are answered by a professional with experience in gambling problems.</td>
</tr>
<tr>
<td>Peer helpline</td>
<td>A possibility of talking to recovered problem gamblers or significant others familiar with problem gambling.</td>
</tr>
<tr>
<td>Chat</td>
<td>An online query and chat service for gamblers, significant others and professionals. Provides answers to similar questions as the helpline.</td>
</tr>
<tr>
<td>OmaPeluuri</td>
<td>Open and facilitated online discussion groups for gamblers, a counter for days without gambling and supportive messages. Open online discussion groups for significant others. Participants register with the service using their e-mail addresses.</td>
</tr>
<tr>
<td>Valtti discussion forum</td>
<td>Online discussion forum for current or recovering problem gamblers.</td>
</tr>
<tr>
<td>Hertta discussion forum</td>
<td>Online discussion forum for significant others.</td>
</tr>
<tr>
<td>Peli poikki (Time to Fold) programme</td>
<td>An eight-week online treatment programme of weekly assignments and telephone discussions with a therapist. Should they wish, the clients can also participate in a peer discussion.</td>
</tr>
</tbody>
</table>
AddictionLink

AddictionLink maintained by the A-Clinic Foundation also offers services for gamblers and significant others. All of its online services can be used free of charge. AddictionLink’s clients can ask for advice about a gambling problem or some other addiction and access the site’s databank. Gamblers may also assess their gambling behaviour and severity using various tests, or keep a gambling diary. They may use the SOGS-R test (South Oaks Gambling Screen Revisited) to evaluate whether or not they have a gambling problem. The purpose of the test is to draw attention to factors frequently associated with problem gambling. This PGSI test is the same as the one offered on the Peluuri website.

The “Rye bread” model is one way of approaching gambling problems and their treatment [10]. This tool can be used to establish what type of problem gambling a gambler engages in, how problem gambling has affected various areas of a gambler’s life, in what areas they are doing well regardless of the gambling, and what aims the gambler is striving to achieve. While the tool helps gamblers understand that gambling problems affect their entire lives and welfare, it is not one of the approved gambling tests.

A counselling service (eNeuvonta) is provided in cooperation with Peluuri. In 2015–2016, the counselling service responded to a total of 124 gambling questions. More than one half of the questions were related to the gambler’s personal situation. The largest age group asking questions about gambling were those aged 18–35.

**TABLE 12c. AddictionLink online services**

<table>
<thead>
<tr>
<th>Type of service</th>
<th>Content of service</th>
</tr>
</thead>
<tbody>
<tr>
<td>Counselling service</td>
<td>Online counselling related to substance abuse and addiction. Counselling is provided by substance abuse professionals in the social and health care sector.</td>
</tr>
<tr>
<td>Gambling diary</td>
<td>This tool helps gamblers set themselves suitable gambling limits or stop gambling.</td>
</tr>
<tr>
<td>Gambling tests</td>
<td>Gambling test: SOGS-R&lt;br&gt;Gambling harms: PGSI</td>
</tr>
<tr>
<td>“Rye bread” model</td>
<td>A tool that can be used to assess the impacts of gambling on different areas of the gambler’s life.</td>
</tr>
<tr>
<td>Data bank</td>
<td>Short information sessions, summaries, evidence-based data, quizzes, information for parents and professionals.</td>
</tr>
</tbody>
</table>
Tiltti

Tiltti, which is maintained by the Blue Ribbon Association, is a low-threshold information and support base and, similarly to Peluuri, is a part of Gambling Clinic's services. Its basic activities include low-threshold support and counselling services offered by social welfare professionals and open or closed group activities based on peer support and the use of experts by experience. Twice a week, Tiltti holds open sessions for gamblers, significant others and professionals who encounter gambling harms in their work. At these sessions, trained volunteers serve as peer facilitators and support persons. Personal financial advice can also be provided at these sessions if necessary [11]. Additionally, Tiltti organises information sessions related to gambling harms, joint activities for gamblers and significant others, and themed evenings for significant others.

Other peer support services

Two national stakeholders organise peer group activities in Finland [12]. Sosped Foundation’s Pelirajatön groups and Gamblers Anonymous (GA), which operate nationwide, offer peer support for problem gamblers and significant others. The purpose of the Sosped Foundation’s activities is to improve the welfare of problem gamblers and significant others by means of peer support. Sosped also offers basic training for peer group leaders. Gamblers Anonymous borrows its operating idea from Alcoholics Anonymous (AA meetings) and works on the same principle. The uncompromising objective of Gamblers Anonymous is to give up gambling, and an effort is made to achieve this goal by going through a 12-step programme.

Financial and debt advice and social assistance

A gambler’s financial situation typically takes a turn for the worse as gambling becomes a problem. A stressful financial situation, efforts to hide it and the ensuing shame may prolong gambling and hamper recovery. Securing the provision of financial and debt advice, among other things by restructuring debts, is vital in the early stages of recovery. An indebted gambler may apply to the Kela office in their living area or Kela’s national online service for social assistance to cover essential expenses.

Financial and debt advice is a statutory municipal service that provides clients with information about managing their personal finance and debts. The advisory service focuses on resolving the client’s debt situation and providing preventive financial advice [13]. In addition to municipal financial and debt advisory services, free services are also provided by social welfare offices, social workers of the Evangelic Lutheran Church and the Guarantee Foundation.

A person with a gambling problem may also require guardianship: a guardian may be appointed to look after the gambler’s personal property and financial matters. The guardian must also make sure that the gambler receives care and attention and has access to rehabilitation. If necessary, the guardian works together with the social and health care professionals in the municipality [14].
12.3 OUTPATIENT AND INPATIENT TREATMENT SERVICES

The provision of treatment services specialising in gambling problems remains rather fragmented in Finland [15]. Before the health and social services reform enters into force, the responsibility for organising health and social services rests with the municipalities. However, there are major variations between the activities of different municipalities [4]. Identifying and assessing gambling problems are part of primary municipal services, whereas organising treatment is included in the municipalities’ specialised services. Such actors as health centres, A-Clinics, mental health clinics, parish welfare workers or psychiatric outpatient clinics may be contacted to seek help for a gambling problem [15].

The choice of treatment form for gambling disorder is determined by the severity of the disorder and many individual factors, including concurrent physical and psychological illnesses [16]. Gambling rarely occurs as an individual problem, and a holistic assessment of the patient's situation is needed before preparing a treatment plan [17]. No Current Care Guidelines for treating gambling disorder exist in Finland as yet. The methods currently used in Finland, including cognitive-behavioural therapy, motivational interviewing and supportive pharmacological care (opioid antagonists), are based on international recommendations. An effort should be made to prepare a national care guideline on treating gambling problems. This care guideline would enable health care professionals to select the most suitable treatment form for the patient, and patients could be referred to treatment more efficiently [3].

12.3.1 Outpatient services

Pursuant to the Act on Social Work with Substance Abusers (41/1986), organising substance abuse services is the responsibility of the municipalities. Currently, the municipalities provide outpatient services themselves or outsource them to different service providers. As a rule, outpatient treatment for problem gambling is organised as part of substance abuse services.

Gambling Clinic and outpatient care

Gambling Clinic, a range of services specialising in the treatment of gambling problems, has been operating in Helsinki since 2010. This range includes such services as Tiltti, Peluuri (see section 12.2) and outpatient care. Gambling Clinic is a joint project between the Cities of Helsinki and Vantaa, NGOs and the central government. The Cities of Helsinki and Vantaa, the A-Clinic Foundation, the Blue Ribbon Association, the Sosped Foundation, Socca Centre of Excellence on Social Welfare in the Helsinki Metropolitan Area and the National Institute for Health and Welfare have been involved in launching and maintaining the activities of Gambling Clinic in 2017–2018. Each one of the project partners meets an agreed share of Gambling Clinic’s costs and contributes to its range of services.
Helsinki and Vantaa are responsible for outpatient care. For the residents of these two cities, treatment is provided free of charge. The National Institute for Health and Welfare financed a national online programme titled Peli poikki (Time to Fold) until early 2017 and continues to cover its coordination, research, monitoring and evaluation costs. Peluuri activities are funded by Veikkaus Oy and administrated by the Blue Ribbon Association, which also implements the services in partnership with the A-Clinic Foundation. Tiltti is a Blue Ribbon Association project funded by STEA (see section 9.3.2). Gambling Clinic is part of a comprehensive project on preventing and reducing gambling harms coordinated by the National Institute for Health and Welfare.

Gambling Clinic’s services are multidisciplinary, and they are offered on a low-threshold principle. This means that the clients can select a form of assistance suitable for them among the services. No referral is needed to receive outpatient care at Gambling Clinic. The majority of its services are provided anonymously. Gambling Clinic offers services of various types, and mutually supportive services can also be used simultaneously. The Peluuri helpline, for instance, directs callers to other services, and those who use outpatient care regularly may also look for peer support in Tiltti.

**Table 12d. Client visits to Gambling Clinic’s outpatient services and Tiltti and the total number of calls received by Peluuri in 2010–2016**

<table>
<thead>
<tr>
<th></th>
<th>2010</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outpatient client visits</td>
<td>560</td>
<td>1390</td>
<td>1360</td>
<td>1242</td>
<td>1156</td>
<td>1349</td>
<td>1483</td>
<td>8540</td>
</tr>
<tr>
<td>Tiltti client visits</td>
<td>118</td>
<td>626</td>
<td>925</td>
<td>1076</td>
<td>1511</td>
<td>2111</td>
<td>2243</td>
<td>8610</td>
</tr>
<tr>
<td>All calls received by Peluuri</td>
<td>2840</td>
<td>2824</td>
<td>2975</td>
<td>2556</td>
<td>2333</td>
<td>2297</td>
<td>1983</td>
<td>17808</td>
</tr>
</tbody>
</table>

Gambling Clinic’s outpatient services also reach clients who otherwise use few social welfare and health services, many of whom are young adults or middle-aged men. Many of these clients have had a serious gambling problem for an extended period. Because of its low threshold and good outcomes, the Peli poikki (Time to Fold) programme has become highly popular, and consequently there is a long queue for this service. In 2016, 159 participants completed the programme.
Outpatient care approaches gambling as part of the client’s life and supports the client’s ability to reflect on the links between gambling, emotions, interpersonal relations and life situations. The treatment process is always individual, as the goals and methods of the outpatient care are negotiated with the client [18].

**A-Clinic Foundation’s outpatient services**

The A-Clinic Foundation currently is the largest NGO-backed provider of nationwide outpatient and 24-hour services intended for those with substance abuse problems. The A-Clinics offer versatile treatment and expert services for adult and minor clients with addictions and for their significant others. The principle of the A-Clinic Foundation is to provide services tailored to an individual’s needs. Treatment is thus provided for both substance abuse and mental health problems, either separately or in tandem. Clients can be referred to the service or come to it on their own initiative. The reason for the visit may be an addiction or the consequences of an addiction, either to the client or significant others.

The A-Clinics offer guidance and counselling, evaluations of treatment needs, outpatient detoxification and withdrawal treatment, and meetings for individuals, couples and families. An individual treatment plan based on problem areas identified in an interview is prepared for clients. The A-Clinic Foundation estimates that approximately three per cent of the clients visit the clinic because of a gambling disorder, which means that the outpatient services of the A-Clinic Foundation (A-Clinics) annually encounter some 600 clients who use the service because of a gambling problem [19]. In addition, treatment-related and functional peer groups and outpatient rehabilitation courses are organised.

**Other outpatient services**

Sovatek Foundation’s outpatient rehabilitation team (Addiction rehabilitation team) rehabilitates problem gamblers in cooperation with the Substance abuse clinic and detoxification ward in Jyväskylä. The starting point is an evaluation of treatment needs carried out by the Substance abuse clinic. No referral is needed. The treatment is supported by peer group activities led by recovered problem gamblers who have received peer instructor training.

Kuopio Crisis Center offers counselling support helping clients cope with a difficult life situation and a range of fee-paying services specialising in gambling problems. Two of its employees also participated in client work in the Peli poikki (Time to Fold) programme for several years.
Valona Child and Family Services are part of the social welfare and wellbeing services of the Evangelic Lutheran Church. Valona outpatient services can assess the situation of or launch an outpatient rehabilitation process for families where gambling is a problem.

Outpatient services are also offered by private service providers who, in most cases, specialise in psychosocial treatment forms for gambling disorder. Drug treatment should only be used as temporary support in addition to other treatment forms. The most extensively studied group of drugs are opioid antagonists that affect the central nervous pleasure system. Parallel drug treatment of anxiety and depression may also support the treatment of gambling disorder. The effectiveness of drugs in treating gambling addiction has been studied in Finland recently [20].

**TABLE 12e. Examples of outpatient services specialising in gambling problems**

<table>
<thead>
<tr>
<th>Service provider</th>
<th>Service</th>
<th>Access to treatment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gambling Clinic</td>
<td>Walk-in service</td>
<td>Without appointment for adult gamblers and significant others in Helsinki and Vantaa</td>
</tr>
<tr>
<td></td>
<td>Outpatient treatment: treatment-oriented discussion session with a psychologist or a social therapist</td>
<td>By appointment for adult gamblers and significant others in Helsinki and Vantaa</td>
</tr>
<tr>
<td>A-Clinic Foundation</td>
<td>Outpatient units: solution-focused and cognitive-behavioural method</td>
<td>Adult clients can access the services through the substance abuse and mental health services in their municipality</td>
</tr>
<tr>
<td>Sovatek Foundation</td>
<td>Outpatient rehabilitation: personal rehabilitation plans for clients</td>
<td>The need for treatment is assessed at the Substance abuse clinic (Jyväskylä), no referral needed</td>
</tr>
<tr>
<td>Kuopio Crisis Center</td>
<td>Therapeutic discussion sessions that may include exercises and assignments</td>
<td>Clients should contact the health and social services in their municipality of residence for a payment commitment</td>
</tr>
<tr>
<td>Valona Child and Family Services</td>
<td>Evaluate the situation or launch an outpatient rehabilitation process</td>
<td>Services are offered in the areas of Pieksämäki, Mikkeli and Jyväskylä</td>
</tr>
<tr>
<td>Private service providers</td>
<td>Psychosocial treatment forms (and drug treatment)</td>
<td>Fee-paying services</td>
</tr>
</tbody>
</table>

12.3.2 Inpatient rehabilitation

Inpatient rehabilitation may be considered when gambling problems are severe or, for example, the client also has alcohol or other substance abuse problems [21]. Clients who are a danger to themselves or others may also need inpatient rehabilitation. In this case, the client spends a certain period at an institution, which may be a substance
abuse rehabilitation institution or a psychiatric hospital, or in a psychiatric ward. The client's consent is needed for inpatient care. A doctor's referral and/or a payment commitment that covers the rehabilitation period may be needed for obtaining a place in inpatient rehabilitation. Payment commitments are issued by the social services office and A-Clinics, for example [10].

**TABLE 12f. Examples of inpatient rehabilitation services for clients with gambling problems**

<table>
<thead>
<tr>
<th>Service provider</th>
<th>Framework</th>
<th>Access to treatment</th>
</tr>
</thead>
<tbody>
<tr>
<td>A-Clinic Foundation’s Addiction Hospital, Hietalinna community, Haarajoki</td>
<td>Drug-free community treatment</td>
<td>Requires a referral and a payment commitment issued by the social and health service</td>
</tr>
<tr>
<td>A-koti rehabilitation centre, Kankaanpää, <a href="http://www.vakry.fi/pelikuntoutus-a-koti/">www.vakry.fi/pelikuntoutus-a-koti/</a></td>
<td>A cognitive work approach, use of workbooks, intensive courses for problem gamblers, individual discussions with a specialist counsellor</td>
<td>The client's rehabilitation needs and situation are evaluated by the municipality, municipality's payment commitment is required</td>
</tr>
<tr>
<td>Pixne-kliniken, Maalahti, <a href="http://www.missbrukarvard.fi/svenska/pixne/">www.missbrukarvard.fi/svenska/pixne/</a></td>
<td>A 12-step programme as a four-week intensive course (in Swedish)</td>
<td>The client pays a share of the cost</td>
</tr>
<tr>
<td>Ridasjärvi addiction treatment centre, Hyvinkää, <a href="http://www.ridis.fi">www.ridis.fi</a></td>
<td>A personal rehabilitation programme and individual meetings with a specialist counsellor</td>
<td>A payment commitment is required before treatment is initiated</td>
</tr>
<tr>
<td>Sovatek Foundation</td>
<td>Rehabilitation courses: four different periods, total duration approx. six months</td>
<td>A minimum of eight registered participants is needed to run the course</td>
</tr>
<tr>
<td>Tolvis center, Maalahti, <a href="http://www.tolviscenter.fi">www.tolviscenter.fi</a></td>
<td>A cognitive and environmental therapy programme, a 12-step programme (Swedish and Finnish speaking employees)</td>
<td>A payment commitment is required</td>
</tr>
<tr>
<td>Tuustaitapale rehabilitation centre, Mäntyharju, <a href="http://www.tuustaitapale.fi">www.tuustaitapale.fi</a></td>
<td>Individual rehabilitation, peer groups, weekly meetings (3 times) with a personal instructor</td>
<td>Requires a payment commitment issued by the client's municipality of residence and a referral with details on the client's state of health, medication and rehabilitation needs</td>
</tr>
<tr>
<td>Valona Child and Family Services, <a href="http://www.valonahyvinvointi.fi">www.valonahyvinvointi.fi</a></td>
<td>An intensive period, therapy work and crisis work</td>
<td></td>
</tr>
<tr>
<td>Ventuskartano rehabilitation institute, Substance abuse centre Portti, Kokkola, <a href="http://www.ventuskartano.fi/">http://www.ventuskartano.fi/</a></td>
<td>Rehabilitation based on networking, community therapy and cognitive behavioural therapy in groups</td>
<td>A payment commitment is required</td>
</tr>
</tbody>
</table>
12.3.3 Methods for supporting significant others

The stressful life situation of significant others should also be taken into account, and offering services for them is important. Treatment programmes for these persons have been developed, and their effectiveness has been studied. Methods that have been the subject of extensive international research include CRAFT and 5-STEP.

CRAFT, or the Community Reinforcement and Family Training method, aims to direct the gambler to treatment, reduce gambling and improve the personal wellbeing of significant others. The model focuses on solving problems through community reinforcement and family training. The family member learns to avoid behaviours that enable gambling, and to adopt behaviours that support the avoidance of gambling or encourage the gambler to seek treatment. The CRAFT method has been used in substance abuse treatment, and there is Finnish research literature on it [22].

The goal of the 5-STEP method is to improve the family member’s wellbeing and to reduce the harms experienced by them. It is based on the Stress-strain-coping-support model, which is solution-focused. Rather than blaming someone, gambling itself is the guilty party and the target of changes [22].

12.3.4 Services for children and young people

The outpatient and rehabilitation services are intended for adults, but support and help are also available for children and young people. While minors are not permitted to gamble, a proportion of young people in Finland continue to do so. The results of the School Health Promotion survey conducted in 2017 indicate that 7.1% of pupils in basic education grades 8 and 9, 6.4% of general upper secondary school students, and 14.1 students in vocational education and training gambled on a weekly basis [23]. Intervention in young people’s gambling problems can be made in pupil and student welfare services, at family counselling clinics, at youth stations and in adolescent psychiatry services [15], but children and young people may also need more extensive support, for example as significant others or in their on-going life situations.

Adolescents and young adults may also contact the Peluuri helpline. They may contact the AddictionLink’s counselling service anonymously with their questions about substance abuse and addictions. The helpline for children and young people and the Web letter service for children and young people are intended for those aged under 21. Confidential help and support are provided for those who call or write. These services are offered by the Mannerheim League for Child Welfare. Youth stations are units of the A-Clinic Foundation that can be contacted by young people aged 13–24 and their family members. The website Nuorten mielenterveystalo (MentalHub for Young People) provides information about gambling and advice for seeking and finding help.

Outreach youth work is part of specialised youth work aiming to help young people, for example with different life management problems. Ohjaamo one-stop guidance centres, which operate on a low-threshold principle, are intended for young people
aged 15–29. Ohjaamo analyses the young persons’ situation and offers them the specific type of guidance and counselling they need. In autumn 2017, only some of the Ohjaamo service points offered substance abuse services [24].

*Table 12g. Information and assistance related to gambling problems for children, young people and family members*

<table>
<thead>
<tr>
<th>Type of service</th>
<th>Content of service</th>
</tr>
</thead>
<tbody>
<tr>
<td>Peluuri helpline</td>
<td>Calls are answered by professionals with experience in gambling problems</td>
</tr>
<tr>
<td><a href="https://peluuri.fi/en">https://peluuri.fi/en</a></td>
<td></td>
</tr>
<tr>
<td>AddictionLink’s counselling service</td>
<td>Online counselling related to substance abuse and addiction. Counselling is provided by substance abuse professionals in the social and health care sector.</td>
</tr>
<tr>
<td><a href="http://www.paihdelinkki.fi/fi/neuvonta">www.paihdelinkki.fi/fi/neuvonta</a></td>
<td></td>
</tr>
<tr>
<td>Helpline for children and young people (Mannerheim League for Child Welfare) <a href="https://www.nuortennetti.fi/apua-ja-tukea/lasten-ja-nuorten-puhelin/">https://www.nuortennetti.fi/apua-ja-tukea/lasten-ja-nuorten-puhelin/</a></td>
<td>Calls are answered by adult volunteers</td>
</tr>
<tr>
<td>Web letter service for children and young people (Mannerheim League for Child Welfare) <a href="https://www.lastenjanuortennetti.net/">https://www.lastenjanuortennetti.net/</a></td>
<td>Rather than calling, children and young people can write letters, which are answered by adult volunteers</td>
</tr>
<tr>
<td>Youth stations (A-Clinic Foundation) <a href="http://www.avi.fi">www.avi.fi</a></td>
<td>Help for problems associated with substance abuse and gambling as well as other similar difficult problems. Intended for young people aged 13–24 and significant others.</td>
</tr>
<tr>
<td>Nuorten mielenterveystalo (MentalHub for Young People) <a href="http://www.mielenterveystalo.fi">www.mielenterveystalo.fi</a></td>
<td>The website provides advice, help and information about mental health. Young people can take tests related to alcohol use and depression.</td>
</tr>
<tr>
<td>Outreach youth work <a href="http://www.avi.fi">www.avi.fi</a></td>
<td>Helps young people aged under 29 who are without a place in education, job or future plans. Finds solutions to young people’s problems and supports them with life management.</td>
</tr>
<tr>
<td>Ohjaamo one-stop guidance centres <a href="http://kohtaamo.info">kohtaamo.info</a></td>
<td>Outreach youth work services, youth services, mental health and substance abuse services, services provided by educational institutions or study guidance services, employment services and information and counselling services for young people</td>
</tr>
</tbody>
</table>

**12.4 BUILDING UP THE COMPETENCE OF PROFESSIONALS**

In recent years, treatment methods for gambling disorder have been studied and developed, and professionals’ competence has been built up. There is a continued need for competence building. Social welfare and health professionals consider gambling disorder a serious problem in Finland. However, many of them find that their capabilities for encountering problem gamblers and significant others are inadequate. Professionals are interested in obtaining more information about identifying and assessing gambling problems, training for treating gambling disorder, and the available support and treatment services [25].
The National Institute for Health and Welfare has carried out long-term work to strengthen professionals’ competence in questions related to gambling problems by producing new online courses and developing the existing ones to meet the needs of different target groups. In 2014–2016, a module of 2 to 9 credits titled “Encountering gambling problems” was put together, and four new modules were produced: “Treatment and rehabilitation methods for gambling problems” (2 credits), “Significant others” (1 credit), “Digital gaming” (2 credits) and parts of the module “Young people and gambling” (2 credits). A total of 850 social welfare and health care professionals participated in the online courses in 2014–2016. Commissioned by the National Institute for Health and Welfare, training in this field and its national provision is coordinated by the Centre of Expertise on Social Welfare in Central Finland Koske. Courses are organised by different training organisations, and employees or students in different fields can participate in them, either as part of their other studies or as professional continuing education.

In 2016, the National Institute for Health and Welfare organised a methodology training programme titled “Controlling gambling disorder” for social welfare and health care professionals. This training is based on cognitive behavioural therapy, and it draws on the therapist’s guide produced by the National Institute for Health and Welfare [26] and a client workbook [27]. The Institute has also built a network of training providers that offers training nationwide. 70 social welfare and health care professionals have participated in the methodology training, and ten new training providers have been included in the programme.

In order to build up competence related to gambling problems, local support and coordination have also been developed in recent years. Training on preventing gambling harms and identifying problematic digital gaming and gambling has been provided in Central and Eastern Finland in the form of the Pelituki project jointly implemented and coordinated by the Sovatek Foundation, Kuopio Crisis Centre and Development Centre Tyynelä.

**12.5 PREVENTION AND TREATMENT OF GAMBLING PROBLEMS IN THE HEALTH AND SOCIAL SERVICES REFORM**

The on-going health and social services reform is one of the largest reforms of administration and practices ever seen in Finland. The goal is that the organisation of social and health services and other regional duties will be transferred from the municipalities to the counties on 1 January 2020. The primary objective of the reform is to reduce welfare and health gaps and improve equal access to services. In addition to reforming the structures and financing, the steering and operating models of health and social care will be thoroughly modernised. However, the municipalities will continue to be responsible for promoting their residents’ health and welfare. The counties’ task will be supporting the municipalities and offering them expertise in welfare and health promotion.
From the perspective of the prevention and treatment of gambling problems, the health and social services reform will both create opportunities for and set challenges to developing the services. As a result of the reform, the prevention of gambling-related harms will be associated with preventive substance abuse work and its organisation as one of the health and welfare tasks assigned to the municipalities and counties. The way health and social services, and mental health and substance abuse services in particular, will be put together will have an overall effect on the organisation of treatment.

The “Getting a grip of gambling problems” peer evaluation project of the National Institute for Health and Welfare assessed the availability, accessibility and quality of the prevention and treatment of gambling problems. In the health and social services reform, the challenges faced by the current service system regarding gambling problems include the lack or random nature of practices and coordination resources for preventing gambling harms, the inaccessibility of services in terms of knowledge and attitudes, and the limited availability of treatment.

During the reform, information on effective models for preventing gambling harms and the organisation of this work as part of preventive substance abuse work will be needed. EHKÄPÄ, an on-going research and development project (2016–2017), will produce information on regional models for preventing gambling harms as part of the organisation of preventive substance abuse work. This modelling exercise is being carried out in cooperation between the preventive substance abuse unit of the National Institute for Health and Welfare and actors performing preventive substance abuse work in Päijät-Häme, Hämeenlinna and Pori.

Modernising operating models and digital solutions for information production is also part of the health and social services reform. In Finnish regions and municipalities, the challenge to preventing and treating gambling problems is that gambling as a phenomenon is not visible in the information produced by the service system. As a rule, it appears that there are no practices for keeping records and statistics on this work. Neither do the municipalities’ welfare reports, which are tools for planning, evaluating and reporting on welfare policy [28], contain comprehensive information on gambling problems in the area and any actions taken to address them. The National Institute for Health and Welfare launched efforts to develop record-keeping and statistics on gambling in 2016.

The health and social services reform stresses the clients’ needs and freedom of choice as well as the diversification of service provision. In the best case, the diversification of public health and social services may increase the range of services relevant to gambling problems, providing a better response to the needs of different customer groups. In order to organise treatment and freedom of choice that meet the clients’ needs, it must be possible to assess the service needs, and the services must be made more accessible. Through evidence-based treatment models and the existing training provider network, private service providers can also offer treatment for gambling problems. This way, a greater number of gamblers who need treatment can be reached around Finland, at the same time lowering the threshold for seeking treatment. On the other hand, it must also be possible to meet the needs of gamblers who require long-term and extensive support and treatment.
In the future, it will be vital to organise timely health and social care services (see early identification), ensuring that the treatment on offer is evidence based. Early identification [13] skills and tools are needed, and attention should be paid to developing and conducting research on them. The National Institute for Health and Welfare is currently developing an early identification and support model for gambling problems in cooperation with different actors. The implementation of this model as part of health and social services will require effective practices for improving competence at county level as well as leadership competence.

Addressing and improving clients’ and residents’ participation is one of the objectives of the health and social services reform. In the future, clients with gambling problems and significant others should have better possibilities of participating in the evaluation and development of the services as well as in making and implementing decisions associated with them.

References


Conclusion

This state of play review describes the transition of the Finnish gambling system and its impacts on such areas as policy, supervision, responsible gambling operation and the prevention and reduction of gambling harms. It also discusses the gambling behaviour and gambling expenditure of Finnish people as well as the gambling harms experienced by gamblers and significant others in the light of the most recent research findings. The review also discusses different support, counselling and treatment services intended for gamblers and significant others.

The launch of the new, fully state-owned gambling company, Veikkaus Oy, was not the only reason that made year 2017 significant. In autumn 2017, a discussion on gambling and gambling expenditure in Finland was triggered in the media. It brought up important questions about gambling proceeds (“Who does the money come from?”) and harms (“Which population groups experience the most severe harms?”). Naturally, these questions have been discussed before, but now the answers were also supported by the latest research findings [1,2].

In 2017, Veikkaus Oy modernised its tools for responsible gambling. Gamblers can now set themselves gambling limits and limits for monetary transactions (at daily and monthly levels and limits for losses), opt for self-exclusions (exclude themselves from certain games or game groups online for a year at a time, or from all gambling until further notice) as well as access restrictions (ban on entering, block on slot machine playing). They can also monitor their time use and gambling in general based on the summary of their gaming account. Veikkaus Oy has also announced that mandatory identification of gamblers will be introduced in a near future. Future population surveys will show what impacts the single gambling operator model and features that promote responsible gambling will have on gambling in Finland.

References


Up-to-date information on the gambling system and operation, gambling and gambling harms as well as services intended for gamblers and significant others can be found on the following websites:

www.stm.fi
www.intermin.fi
http://www.arpajaishallinto.fi/
www.peliklinikka.fi
https://peluuri.fi/en
INTRODUCTION TO THE AUTHORS

Chapter 12 was co-authored by Sari Castrén, Senior Researcher, PhD, Adjunct professor and psychologist. Her work at the National Institute for Health and Welfare involves research in and development of treatment for gambling disorder and promoting the use of effective methods in Finland. In addition to her research, she provides training and gives lectures and, on a part-time basis, engages in clinical work focusing on both substance abuse and behavioural addictions.

Jemina Fabritius, Senior Adviser, M. L., Saila Suominen, Head of Unit, M.Sc. (Tech), and Tiina Tulirinta, Senior Advisor, M. L., worked on the contents of Chapter 5 on legal protection and the prevention of abuses and crime. Fabritius works in the Supervision of Gambling Services unit of the National Police Board’s Gambling Administration and, among other things, is responsible for supervising the prevention of money laundering and financing of terrorism. Suominen heads the Computerised Supervision unit in the Gambling Administration. Tulirinta’s areas of responsibility in the Gambling Administration are the supervision of lotteries as well as pools and combination games. She also develops and directs the activities of the official supervisors of gambling operations.

Johanna Järvinen-Tassopoulos, Senior Researcher, D. Pol. Sc., Adjunct professor, edited the review, wrote the introduction, and co-authored Chapters 9, 10, 11 and 12 on Veikkaus Oy’s turnover, societal harms, responsible gambling tools and support, counselling and treatment services. She works at the National Institute for Health and Welfare and specialises in gambling research with a social science approach.

Minna Kesänen, Senior Planning Officer, M. Soc. Sc., and social worker, co-authored Chapter 11 on the prevention of gambling harms and Chapter 12 on support, counselling and treatment services. She works at the National Institute for Health and Welfare on such areas as the development of support, counselling and treatment services in social welfare services and as part of the health and social services reform.

Tuomas Koskela, Evaluation and Development Manager, M. Pol. Sc., co-authored Chapter 9 on the distribution and use of gambling proceeds. During the writing process Koskela was responsible for evaluating the effectiveness and impacts of financed activities and development efforts at the Funding Centre for Social Welfare and Health Organisations (STEA).

Sari Laitakari, Head of Unit, M. L. with court training, and Mikko Cantell, Senior Adviser, M. Pol. Sc., wrote Chapter 4 on the starting points of gambling operation. Cantell also co-authored Chapter 9 on gambling proceeds. Laitakari works as the Head of the Supervision of Gambling Services unit in the National Police Board’s Gambling Administration. Cantell works in Gambling Administration’s General Administration unit, where his areas of responsibility include communications, reporting and statistics.

Sanna Leinonen, Senior Adviser, M. L., contributed to Chapter 2 on gambling policy and its implementation. She works in the Supervision of Gambling Services unit in the National Police Board’s Gambling Administration, where her areas of responsibility are the prevention of illegal gambling activities and supervision of marketing.
Jarkko Mikkola, Senior Adviser, M. L., lent his expertise to the contents of Chapter 6 on the marketing of gambling products and its supervision. He works in the Supervision of Gambling Services unit in the National Police Board’s Gambling Administration, assuming responsibility for the legitimisation grounds of gambling activities as well as EU and international affairs among other things.

Antti Murto, Specialist, M. Sc. Pol., co-authored Chapters 9 and 11. He worked in the field of gambling for an extensive period. He assumed responsibility for a project aiming to prevent gambling harms experienced by young people in the Finnish Association for Substance Abuse Prevention. He analysed client data and developed the operating concept of Peliklinikka. He also worked as a Senior Planning Officer with special responsibility for the prevention of gambling harms and, in particular, methods for assessing gambling harms at the National Institute for Health and Welfare, and at the Ministry of Social Affairs and Health in expert tasks related to the field of gambling harms, of which could be cited his role as the Secretary General of the working group evaluating gambling harms. Murto lost his battle against a serious illness on 29 May 2017 as this work was being written.

Asta Mykkänen, Senior Adviser, LLB, co-authored Chapters 4, 5 and 11. She works in the Supervision of Gambling Services unit in the National Police Board’s Gambling Administration.

Elina Rydman, Ministerial Adviser, M. L., co-authored Chapter 1 describing the transition of the Finnish gambling system, Chapter 2 on gambling policy and its implementation, Chapter 3 describing the international operating environment of gambling as well as Chapter 9 on gambling proceeds. She works at the Ministry of the Interior’s Police Department, where her duties include drafting gambling policy and legislation.

Anne Salonen, Senior Researcher, Adjunct professor, wrote Chapter 7 on the prevalence of gambling, Chapter 8 on gambling expenditure, and Chapter 10 on gambling problems and harms. She works at the National Institute of Health and Welfare as the responsible researcher of the Finnish gambling survey and the Gambling Harms Survey.

Jani Selin, Senior Researcher, D. Soc. Sc., co-authored Chapter 11 on preventing gambling harms. He conducts research in gambling policy and the gambling system at the National Institute for Health and Welfare.

Jukka Tukia, Ministerial Adviser, M. L. with court training, co-authored Chapter 1 describing the transition of the Finnish gambling system, Chapter 2 on gambling policy and its implementation, Chapter 3 describing the international operating environment of gambling as well as Chapter 9 on gambling proceeds. He works at the Ministry of the Interior’s Police Department, where his duties include drafting gambling policy and legislation.

Particular thanks go to Saini Mustalampi for commenting on the manuscript during the writing process.
State of play 2017: A review of the Finnish gambling system

What does the Finnish gambling system based on monopoly look like after the merger of the three gambling operators? How is the marketing of gambling services supervised? How much money do Finnish people spend on gambling? What is the volume of gambling activities directed from Finland to abroad? What are gambling proceeds used for? Where can you find help for problem gambling?

These are some of the questions to which State of play 2017: A review of Finnish gambling provides answers. The review examines the Finnish gambling system and policy, gambling in Finland, gambling harms experienced by gamblers and significant others, prevention and reduction of gambling harms as well as the treatment of gambling problems. The authors of the review are researchers and specialists from the National Institute for Health and Welfare as well as public servants from the Ministry of the Interior, the Gambling Administration and the Ministry of Social Affairs and Health.