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**Sent on:** den 30 juli 2026 11:00:17  
**To:** Registrator <Registrator@spelinspektionen.se>  
**Subject:** 21Si540 - Kaizen Gaming response to consultation on new RG measures  
**Attachments:** 20260730\_SE consultation on RG regulations\_Kaizen Gaming.docx (32.76 KB)

Good afternoon,

[Kaizen Gaming](#), currently a license applicant in the Swedish market, is a global leader in i-gaming, providing premium entertainment experience to its customers across 20 international markets.

We welcome the opportunity to provide input to the public consultation on the Swedish Gambling Authority's regulations and general advice (LIFS 2028:2) on responsible gambling.

Please find our response in the attachment.

Best regards,

Vasiliki

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Being mindful of potential time zone differences, there is no expectation for you to respond outside your regular working hours. Your time and attention are greatly appreciated, and I look forward to hearing from you at a time that's convenient for you.

***Response to the SE consultation on new regulations on responsible gambling and general advice (2018:2) on responsible gambling.***

**1. Introduction**

Kaizen Gaming, currently a license applicant in the Swedish market, is a global leader in i-gaming, providing premium entertainment experience to its customers across 20 international markets. We aim to continuously improve our products and services to provide the best and most trusted online gaming experience to our customers.

Betano, our leading online sports betting and gaming brand, has an established presence across Europe, the Americas and Africa.

At Kaizen Gaming, Responsible Gaming is a cornerstone of how we operate. We are committed to providing a safe and enjoyable gaming environment in which players can engage responsibly, and to intervening early and proportionately when signs of risk emerge.

In line with Chapter 14, Section 1 of the Swedish Gambling Act (2018:1138), Kaizen's Duty of Care Action Plan aims to protect players against excessive gambling, and to help them reduce their gambling where there is reason to do so.

Kaizen Gaming, takes the opportunity to comment on the Proposal for new regulations on responsible gambling, that will replace the Swedish Gambling Authority's regulations and general advice (LIFS 2018:2) on responsible gambling.

**2. Comments**

**Chapter One: Scope of Application and Definitions**

**Section 2 – Definitions**

*The terms and definitions used in these regulations have the same meaning as in the Gaming Act (2018:1138) and the Gaming Ordinance (2018:1475). In these regulations, the following terms are defined as follows:*

1. *excessive gambling: gambling behavior that results in or risks resulting in negative financial, social, or health consequences for the player.*
2. *pace of play: the frequency of a player's wagers with the licensee;*

***Response to the SE consultation on new regulations on responsible gambling and general advice (2018:2) on responsible gambling.***

**Kaizen comments:**

- The definition of “excessive gambling” is principle-based and includes behavior that merely “risks” negative consequences. Any additional guidance on how the SGA’s expectations regarding the operators’ evidence that their judgment was reasonable and consistent when deciding whether duty-of-care obligations are to be triggered is strongly welcome and would facilitate compliance. In addition, “Pace of play” is defined as the frequency of wagers. Is a specific metric or measurement window (e.g., wagers per minute, per session) expected so that operators measure it consistently?

**RG Risk & Impact:**

- Broad, principle-based definitions create interpretation risk: what one operator classifies as “excessive” another may not, leading to inconsistent treatment of comparable players across the market. Without a common metric for “pace of play” and “excessive gambling,” detection models will diverge between operators, undermining comparability and regulatory predictability.

**Chapter Two: Assessment and Measures in Cases of Excessive Gambling**

***Assessment of whether gambling behavior constitutes excessive gambling***

**Section 2**

*The assessment under Section 1 shall be made by weighing all information regarding the player’s gambling behavior that is known or should have been known to the licensee. In making this assessment, the following circumstances shall be given special consideration:*

1. *the player engages in long gaming sessions;*
2. *the player gambles several times a day or a week;*
3. *the player gambles at night (12:00 a.m.–6:00 a.m.);*
4. *the player’s deposits or wagers are increasing in number or size;*

***Response to the SE consultation on new regulations on responsible gambling and general advice (2018:2) on responsible gambling.***

- 5. the player sets a deposit limit higher than 10,000 kronor per month;*
- 6. the player raises a deposit limit;*
- 7. the player's attempt to make a deposit is declined by a bank or payment service provider due to insufficient funds;*
- 8. the player resumes gambling after having previously been suspended from gambling with the licensee;*
- 9. the player resumes gambling after having previously been suspended from gambling by another licensee or in the national self-exclusion registry, provided that the player has personally provided this information to the licensee;*
- 10. the player expresses a need to win back lost money when contacting the licensee;*
- 11. the player exhibits agitated, aggressive, or threatening behavior when contacting the licensee;*
- 12. the player states that they have limited financial resources when contacting the licensee; and*
- 13. the player shows signs of mental health issues or expresses a perception of excessive gambling when contacting the licensee.*

*A circumstance referred to in the second paragraph need not be taken into account if, given the nature of the form of gambling in question, there is no practical possibility for the licensee to identify the circumstance.*

**Kaizen comments:**

- Kaizen Gaming fulfils its obligation to continuously monitor gambling behavior through our in-house AI-driven behavioral monitoring tool. The tool analyses player data on an ongoing basis and assigns each registered player a risk level on a four-tier scale. Risk levels are dynamic and updated continuously as new behavioral data is generated.

We would like to request further clarification on the indicators listed in Section 2. We would like to have a better understanding whether the regulator considers the need to

***Response to the SE consultation on new regulations on responsible gambling and general advice (2018:2) on responsible gambling.***

assess all indicators together and use professional judgment, or whether certain indicators could automatically trigger an intervention.

In addition, further clarification is sought on the definition of “long” - *the player engages in “long” gaming sessions*. On time spent gambling, our practices include monitoring **Time consumption** in consecutive active days, total gambling time, distribution of activity across hours and days. We would also seek further guidance on how many times does “several” refer to? - *the player gambles several times a day or a week*.

**Section 3**

*In the case of gaming on slot machines pursuant to Chapter 5 and online gaming pursuant to Chapters 5–8 of the Gaming Act (2018:1138), the licensee shall, when making the assessment pursuant to Sections 1–2, consider the difference between the player’s deposits and withdrawals. In the case of online gaming pursuant to Chapters 5–8 of the Gaming Act, the licensee shall also take into account the difference between the player’s wagers and winnings.*

**Kaizen comments:**

- Section 2 lists thirteen circumstances for “special consideration.” Is any single circumstance sufficient to conclude excessive gambling, or is a weighted/scored model expected? Will the SGA publish guidance on how the circumstances should be weighed?
- For Section 3, over what period should the deposit-vs-withdrawal and wager-vs-winnings differentials be calculated (per session, rolling 30 days, lifetime)?

**RG Risk & Impact:**

- Several criteria (long sessions, multiple plays per day/week, night play, increasing activity) also describe ordinary highly-engaged players. Over-flagging risks a high false-positive rate and pushes legitimate customers toward unregulated sites.

***Response to the SE consultation on new regulations on responsible gambling and general advice (2018:2) on responsible gambling.***

***Measures if gambling behavior constitutes excessive gambling***

**Section 4**

*If gambling behavior constitutes **excessive gambling**, the licensee shall immediately take individualized measures to limit the negative economic, social, or health-related consequences that such gambling behavior may entail and shall follow up on the measures taken. The measures and their follow-up shall be tailored to the severity of gambling behavior and the pace of gambling. Consideration shall also be given to the development of the player's gambling behavior and whether the player is between the ages of 18 and 24.*

**Kaizen comments:**

- Kaizen Gaming acts proportionate to the level of risk. Interventions are applied early, before harm is established, and escalate in intensity as risk increases. At all levels, contact is designed to invite player reflection and response, not merely to deliver information. Section 4 requires measures “immediately.” We would like to know whether the regulator expects a specific response-time expectation (SLA) to apply from the point of detection to the point of action.

**Section 6**

*If, even after a measure has been taken, the player continues to exhibit gambling behavior that constitutes excessive gambling, a more intrusive measure shall be taken immediately.*

**Kaizen comments:**

- Kaizen Gaming applies restrictions proportionate to severity. Available measures include deposit or loss limit reductions, restriction to withdrawal-only account access, mandatory breaks of one or three months, and permanent account closure. Restrictions are applied without delay. In cases involving acute distress or financial harm disclosures, restrictions may be applied immediately at the discretion of the RG Officer. Players are directed to Stödlinjen and Spelpaus.se at the point any restriction is imposed. Section 6 requires escalation to a “more intrusive measure.” Is a defined escalation ladder expected, or is sequencing left to operator discretion? Over what observation window is “continues to exhibit” judged before escalation is required?

***Response to the SE consultation on new regulations on responsible gambling and general advice (2018:2) on responsible gambling.***

**Section 7**

*When the licensee provides feedback on the player's gambling behavior pursuant to Section 5, the licensee must ensure that the player receives the feedback. If the licensee cannot ensure that the player has received the feedback, or if the player fails to provide the requested information for further assessment of their gambling behavior, an access restriction shall be applied promptly until this has been done.*

**Kaizen comments:**

- Section 7 requires the operator to “ensure” the player received the feedback. What evidence of receipt is acceptable: a delivery/open receipt, an in-product acknowledgment, or a two-way confirmation?

**Section 8**

*If a player expresses suicidal thoughts, the license holder must immediately impose an access restriction that completely denies the player access to the license holder's games for at least six months.*

**Kaizen comments:**

- When a player makes a comment that indicates a threat to their own life or a serious personal safety concern, a PSA (Player Safety Alert) process is triggered, to be treated as a matter of the utmost urgency. While we intend to refund any remaining balance once the account is immediately blocked, we would like to understand whether access is allowed for withdrawals only whilst blocking deposits, betting, and wagering, or shall a complete block without login be applied?

**Chapter Four: Training**

**Section 2**

*Management and staff referred to in Chapter 14, Section 14 of the Gambling Act (2018:1138) shall undergo training in accordance with Section 1:*

***Response to the SE consultation on new regulations on responsible gambling and general advice (2018:2) on responsible gambling.***

1. *no later than three months after commencing employment with or an assignment for the licensee; and*
2. *at least once every two years.*

*The licensee must maintain a list of persons who have completed the training. The list must indicate when the training was completed.*

**Kaizen comments:**

- The draft requires licensees to maintain a training-completion list. Could SGA clarify the minimum information that must be recorded and the period for which such records should be retained?

**Chapter Five: Login and Automatic Logout**

**Section 2**

*For online gaming pursuant to Chapters 5–8 of the Gaming Act (2018:1138), the licensee shall ensure that a player who has not played or otherwise been active for one hour is logged out of their gaming account. Before such a logout occurs, the player may be given the option to choose to remain logged in. If the player does not confirm within ten minutes of being given such an option that they wish to remain logged in, the player shall be logged out of their gaming account.*

**Kaizen comments:**

- In most of operating markets a Session Time starts when a customer logs in. In DE an activity timer is deployed when the player starts playing. We would like to understand how is “active” defined for the one-hour inactivity timer – does any page interaction count, or only a placed bet/financial action?

**Chapter Six: Communication Regarding Responsible Gaming**

**Section 1**

*In the case of online gaming pursuant to Chapters 5–8 of the Gaming Act (2018:1138), the player shall be given the opportunity to communicate in real time with a live person at the licensee regarding responsible gaming. This communication shall be offered via telephone and chat, or another means of communication comparable to chat. The*



***Response to the SE consultation on new regulations on responsible gambling and general advice (2018:2) on responsible gambling.***

*communication shall be available in Swedish. This communication option must be available for at least 8 hours per day.*

**Kaizen comments:**

- The minimum is 8 hours per day – which hours must be covered, and must they align with peak play (including evenings and weekends) when RG risk is highest?

**Chapter Nine: Limits on Deposits, Losses, and Login Time**

**Section 2**

*A licensee may not provide players with suggestions regarding the deposit or loss limits referred to in Chapter 11, Section 3 of the Gaming Ordinance (2018:1475). The provisions of the first paragraph do not prevent the licensee, within the framework of the duty of care under Chapter 14, Section 1 of the Gaming Act (2018:1138), from urging a player to review or lower their limits, from suggesting such reductions, or from implementing reductions in the limits. Nor does the provision in the first paragraph prevent the licensee from providing information regarding the minimum amount required for the player to participate in gambling.*

**Section 4**

*A licensee may not suggest limits when a player is offered the opportunity to limit their login time pursuant to Section 3. The provisions of the first paragraph do not prevent the licensee, within the framework of the duty of care under Chapter 14, Section 1 of the Gambling Act (2018:1138), from urging a player to review or lower their limits, from suggesting such reductions, or from implementing reductions in the limits.*

**Kaizen comments:**

- Where is the line between a prohibited “suggestion” of a limit (Sections 2 and 4) and a permitted duty-of-care nudge to “review or lower” limits? Would a 35% limit reduction as part of a duty of care intervention be considered acceptable, for example?

***Response to the SE consultation on new regulations on responsible gambling and general advice (2018:2) on responsible gambling.***

**RG Risk & Impact:**

- Prohibiting suggested limits removes the option of helpful default anchoring; combined with the criteria in Chapter 2 (where raising a limit is itself a risk flag), operators must design limit journeys carefully to remain compliant while still encouraging tool use.