

A background image showing three young professionals walking along a paved path outdoors. On the left, a man in a dark suit and white shirt walks towards the camera. In the center, a woman in a light-colored suit walks slightly behind him. On the right, another man in a dark suit walks away from the camera, holding a black folder. The background features a modern building with a glass facade, greenery, and a clear sky.

Thematic Review

Player  
Protection:  
**Self-Exclusion Practices in  
the Online Gaming Sector**

Malta Gaming Authority



# Content

Abbreviations.....	4
Definitions.....	5
<b>1 Context.....</b>	<b>7</b>
1.1 Purpose & Scope.....	8
1.2 Structure of the Document.....	8
<b>2 Methodology.....</b>	<b>9</b>
<b>3 Thematic Findings and Regulatory Guidance.....</b>	<b>11</b>
3.1 Delayed Exclusions.....	12
3.1.1 Findings.....	12
3.1.2 Regulatory Requirements.....	12
3.1.3 MGA Expectations.....	13
3.1.4 Recommended Best Practices.....	13
3.2 Reversal of Self-Exclusion Without Cooling-Off Period.....	14
3.2.1 Findings.....	14
3.2.2 Regulatory Requirements.....	14
3.2.3 MGA Expectations.....	14
3.2.4 Recommended Best Practices.....	14
3.3 Failure to Prevent Cross-Brand Registration Following a Self-Exclusion.....	15
3.3.1 Findings.....	15
3.3.2 Regulatory Requirements.....	15
3.3.3 MGA Expectations.....	16
3.3.4 Recommended Best Practices.....	17



# Abbreviations

MGA	Malta Gaming Authority
URL	Uniform Resource Locator
B2C	Business-to-Consumer
KYC	Know Your Customer



# Definitions

Unless otherwise stated, all terms used herein shall bear the same meaning ascribed to them under the Gaming Definitions Regulations (S.L. 583.04 of the Laws of Malta). Only terms not defined within the abovementioned Regulations shall be interpreted in accordance with the definitions provided hereunder.

Licensee	An Authorised Person who has been licensed to carry out a gaming service or a critical gaming supply by the Malta Gaming Authority.
Thematic Review	<p>A Thematic Review is a focused supervisory activity conducted by the Authority to examine specific areas of compliance or operational practices across a representative sample or specific categories of licensees. The objective of this review is to identify common findings, trends, and practices within the sector, enabling the Authority to provide targeted guidance, drive industry-wide improvements, and assist licensees in avoiding common pitfalls. Thematic Reviews can take different forms of supervisory engagements.</p> <p>The outcomes of these reviews are shared with the relevant licensees, offering tailored feedback on identified issues. Where appropriate, the Authority may also communicate the relevant findings and recommendations to the wider public through outreach initiatives. In instances where review findings highlight specific concerns in relation to a particular licensee, the Authority will directly address these with the licensee, initiating specific follow-ups or requiring remedial actions as necessary. These reviews serve as a proactive tool for promoting transparency and compliance within the industry.</p>
Mystery Shopping	Mystery Shopping is a targeted supervisory tool employed by the Authority to evaluate compliance and best practices. By reproducing real-world scenarios, mystery shopping provides the Authority with an unfiltered view of how regulatory requirements are applied in practice. The insights gathered from these evaluations enable the Authority to monitor adherence to the regulatory framework effectively and identify areas for improvement. Findings from mystery shopping activities help the Authority to monitor and enforce regulatory requirements and guide licensees toward enhancing their practices. Ultimately, this method supports the Authority’s commitment to fostering a safer and more transparent gambling environment, ensuring industry standards are upheld.
Self-Exclusion	A self-exclusion is a responsible gambling tool that prevents a player from accessing the account for a set timeframe or indefinitely.

B2C Licensee	A person licensed by the Authority to provide or carry out a gaming service from Malta or to any person in Malta, subject to the requirement of obtaining a licence in terms of regulation 3 of the Gaming Authorisations Regulations, which for the avoidance of doubt shall include the persons operating the games mentioned in regulation 8, but not the persons operating any games in terms of regulations 5, 7, 22, 29, 30 and 31 of the Gaming Authorisations Regulations.
Corporate B2C Licensee	A licence issued by the MGA to a Corporate Group in terms of the Gaming Authorisations Regulations (S.L. 583.05).

The background features a solid light orange color. Overlaid on this are two large, abstract shapes in a darker shade of orange-red. One shape is a large, inverted triangle with a rounded bottom vertex, pointing downwards from the top center. The other shape is a large, rounded triangle pointing upwards from the bottom left corner. The word "Context" is written in a bold, white, sans-serif font in the lower right area of the image.

**Context**



## 1.1 Purpose & Scope

The scope of this review relates to Business to Consumer (“B2C”) Licensees and Corporate Group Licensees operating in the online gaming sector. Land-based operations fall outside this scope, and the findings are presented in the context of the Authority’s supervisory remit for online gaming activities.

As outlined in the Malta Gaming Authority’s (the “MGA” or the “Authority”) publication Regulatory Oversight: Supervisory Engagement Efforts 2025, the Authority conducted a Thematic Review during 2025 focusing on Self-Exclusion practices implemented by a sample of Licensees. This initiative was prompted by a recurring pattern of complaints concerning self-excluded individuals who were able to access multiple brands operating under the same licence. These complaints raised material concerns regarding the adequacy and effectiveness of player protection mechanisms deployed by B2C Licensees.

In response, the Authority initiated this Thematic Review as a targeted supervisory engagement tool to assess the extent of compliance and to identify systemic weaknesses. The Review examined Licensees’ implementation of regulatory obligations, with particular emphasis on governance, control effectiveness, and adherence to player protection requirements.

This document sets out the Authority’s principal observations, highlighting areas of insufficient compliance and providing clarity on the regulatory expectations applicable to Licensees. It also includes recommended practices designed to assist Licensees in strengthening their internal frameworks and promoting consistent, industry-wide alignment with player protection standards.

Through this publication, the Authority aims to foster a culture of proactive compliance and continuous improvement, thereby contributing to the long-term sustainability, integrity, and accountability of the remote gaming sector.

## 1.2 Structure of the Document

Following this introduction, Section 2 provides an overview of the methodology used for this Thematic Review. Section 3 details the observations of the Thematic Review, including applicable regulatory requirements, MGA expectations and recommended best practices. Section 4 concludes this document.





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**Methodology**

As part of this Thematic Review conducted between Q1 and Q2 of 2025, a total of **20 Licensees** and **58 active URLs** were selected for assessment. The Thematic Review was conducted in the form of a mystery shopping exercise, in line with the applicable Regulatory Framework. It included checks on self-exclusion as well as other responsible gambling tools and functionalities.

An assessment was carried out across three brands from each of the 20 Licensees to evaluate system behaviour and adherence to the Player Protection Directive (Directive 2 of 2018).

For Brand A, a player account was registered using a fixed set of personal details, followed by deposits and gameplay to test platform functionality. Brand B involved registering with the same details, initiating self-exclusion on Brand A, and verifying whether this exclusion extended to Brand B. Brand C tested the system's ability to detect linkage by registering with similar but not identical personal details; where registration succeeded, deposits and gameplay were used to determine whether the system failed to identify the previously self-excluded profile.





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# Thematic Findings and Regulatory Guidance

The following section sets out the core areas of non-compliance identified during the Thematic Review. These findings reflect instances where Licensees did not sufficiently meet the requirements prescribed under the applicable regulatory framework. Each observation is accompanied by a reference to the relevant regulatory provision, the Authority’s expectations in that regard, and a set of recommended practices intended to assist Licensees in reinforcing their compliance mechanisms.

All findings arising from the Mystery Shopping Thematic Review have been duly communicated to the relevant licensees. Each licensee was afforded the opportunity to address the respective findings and submit a rectification plan for each. Furthermore, where deemed appropriate, enforcement measures were escalated in accordance with applicable regulatory provisions.

The Authority’s intention is to provide clarity and direction that enables Licensees to align more closely with their obligations, particularly those concerning player protection. This section is designed not only to highlight areas requiring improvement, but also to serve as a practical resource that encourages consistency, accountability, and a proactive compliance culture across the online gaming sector.

3.1 Delayed Exclusions

3.1.1 Findings

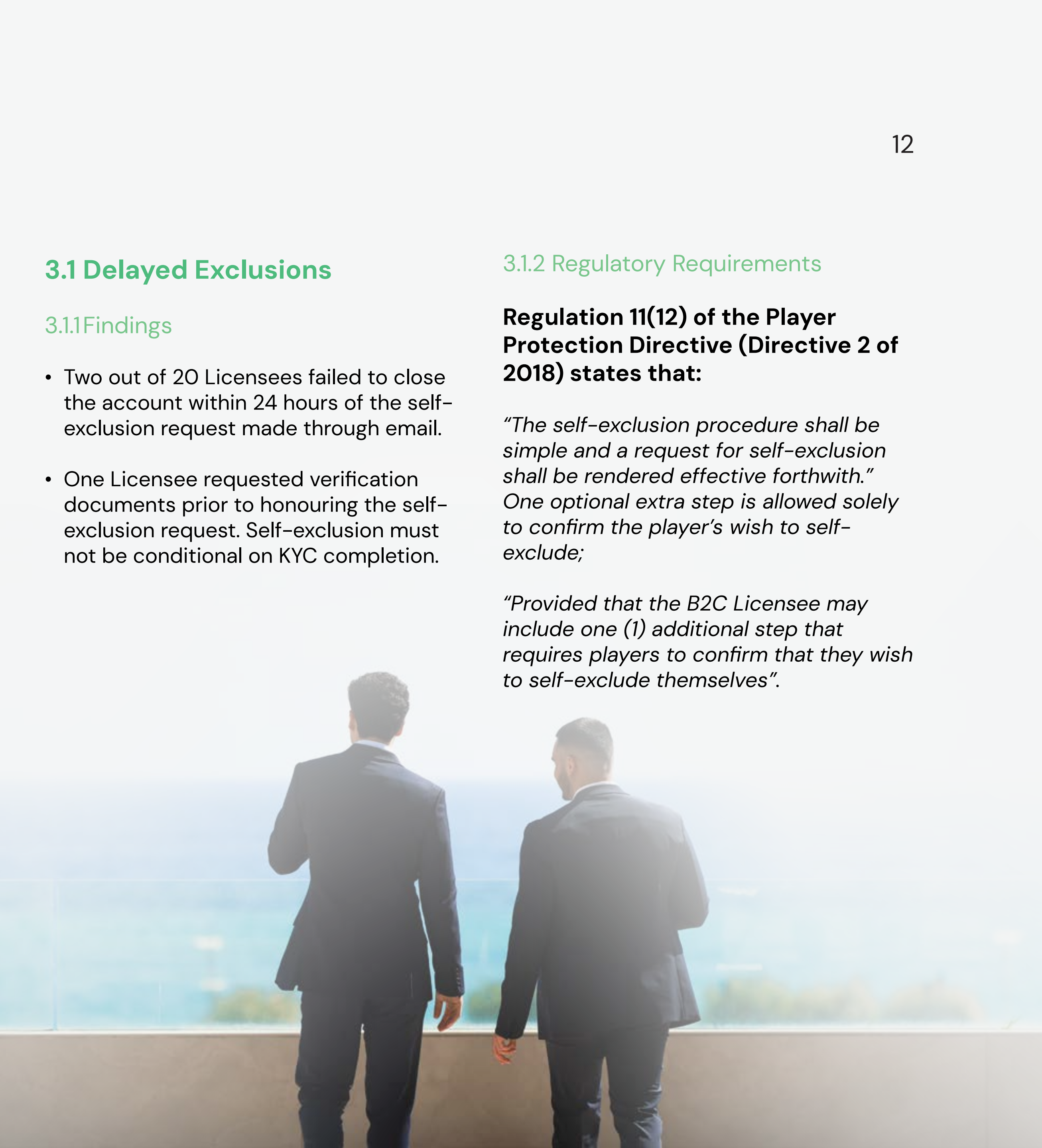
- Two out of 20 Licensees failed to close the account within 24 hours of the self-exclusion request made through email.
- One Licensee requested verification documents prior to honouring the self-exclusion request. Self-exclusion must not be conditional on KYC completion.

3.1.2 Regulatory Requirements

**Regulation 11(12) of the Player Protection Directive (Directive 2 of 2018) states that:**

*“The self-exclusion procedure shall be simple and a request for self-exclusion shall be rendered effective forthwith.” One optional extra step is allowed solely to confirm the player’s wish to self-exclude;*

*“Provided that the B2C Licensee may include one (1) additional step that requires players to confirm that they wish to self-exclude themselves”.*





### 3.1.3 MGA Expectations

In line with Regulation 11(12), self-exclusion requests must be implemented forthwith, meaning without delay and effective immediately upon receipt. The Authority does not consider any period longer than 24 (twenty-four) hours to meet the definition of forthwith. Furthermore, no additional conditions, including identity verification or other internal processes may be applied in a manner that postpones or hinders the immediate activation of a self-exclusion request.

*Example: When a player submits a self-exclusion request, the Licensee must activate it immediately, without introducing delays or obstacles. This means the self-exclusion must take effect at once and in any case no later than 24 hours from receipt.*

### 3.1.4 Recommended Best Practices

Where a player submits a self-exclusion request via email or chat rather than directly through their account, Licensees should ensure that such requests are prioritised and implemented without delay, and in any case no later than 24 (twenty-four) hours from receipt of the request. Identity verification or other checks cannot be used to postpone or block the immediate activation of the self-exclusion.





## 3.2 Reversal of Self-Exclusion Without Cooling-Off Period

### 3.2.1 Findings

- One Licensee removed the self-exclusion upon player request, without imposing a mandatory cooling-off period.

### 3.2.2 Regulatory Requirements

#### **Regulation 10 (11) of the Player Protection Directive (Directive 2 of 2018):**

*“Any request made by the player to decrease or revoke a definite period of self-exclusion shall be effective only after the lapse of not less than twenty-four (24) hours from the day on which the B2C Licensee accedes to such a request, and a request made by the player to decrease or revoke an indefinite period of self-exclusion shall be effective only after the lapse of not less than seven (7) days from the day on which the B2C Licensee accedes to such a request”.*

### 3.2.3 MGA Expectations

In line with the above Regulation, Licensees must ensure that any request by a player to decrease or revoke a self-exclusion period is not actioned immediately. A mandatory cooling-off period must apply:

- At least 24 hours before revoking or reducing a definite self-exclusion.
- At least seven days before revoking or reducing an indefinite self-exclusion

*Example: A player requests to reduce a 6-month (six-month) self-exclusion after 2 (two) months. The Licensee acknowledges the request and assesses the explanation of the circumstances that led to the request. Then, they inform the player that the reduction of the self-exclusion will only be effective after the mandatory 24-hour cooling-off period. The account remains inaccessible until the period elapses, after which the exclusion is reduced/lifted accordingly, and the player is informed of the responsible gambling tools.*

### 3.2.4 Recommended Best Practices

- Licensees should engage in a substantive dialogue with the player to understand the underlying reasons for the request to revoke or reduce a self-exclusion period. This conversation should be meaningful and comprehensive, rather than limited to a single question. Upon finalising the discussion, the player should be informed of the timing and conditions under which the change will take effect. Licensees are also expected to remind players of the available responsible gambling tools and, where appropriate, assist in setting limits to support safer gambling. Furthermore, during the mandatory cooling-off period, the player should be advised that the request may be reversed should they reconsider.

- Licensees should ensure that their systems are configured such that, notwithstanding any communication initiated between the operator and the player, any revocation or reduction of a self-exclusion period is subject to an automatic delay mechanism. This mechanism is intended to prevent the execution of such requests until the mandatory cooling-off period has fully lapsed.
- Licensees are expected to provide clear communication to the player at the point of request, stating when the change will take effect.

Where feasible, Licensees should introduce a player reminder during the cooling-off period, giving them the option to maintain the self-exclusion if they reconsider.



### 3.3 Failure to Prevent Cross-Brand Registration Following a Self-Exclusion

#### 3.3.1 Findings

- Three Licensees allowed registration, deposit, and play on Brand C despite the use of similar identity fields to those of a self-excluded player.

#### 3.3.2 Regulatory Requirements

##### **Regulation 11 (4) of the Player Protection Directive (Directive 2 of 2018):**

*“Any exclusion implemented in terms of this article shall be offered:*

*(a) for all the games offered by the B2C Licensee, and optionally, but not alternatively to the latter, for one (1) or more games or for one (1) or more gaming verticals;*

*and (b) across all the means by which the B2C Licensee provides its services, and optionally, but not alternatively to the latter, across one (1) or more websites and, or one (1) or more remote means.*

*Provided that, in the absence of a unified self-exclusion database for remote gaming operations, where the B2C Licensee operates multiple brands, if the brands require separate player registration, the B2C Licensee may allow for self-exclusion to be limited to a player’s activity on the brand on which the player has requested self-exclusion, and the above subarticles (a) and (b) shall be applicable to that individual brand.*

*Provided further that, in the event that a player has been excluded in light of sufficient reasons which indicate that the player may have a gambling problem, irrespective of whether the player has requested the self-exclusion himself or has been excluded by the B2C Licensee in accordance with sub-article (5) (b), that player shall be excluded across all brands operated by the B2C Licensee, irrespective of whether the brands require separate player registration.”*

##### **Regulation 30(5) of the Gaming Authorisations and Compliance Directive (Directive 3 of 2018) states that**

*“B2C Licensees shall have systems in place to detect identical or similar player details, as well as other mechanisms such as systems detecting the use of the same internet protocol address and, or device identifier and, or SIM card identifier by different players, or such other mechanisms as may be appropriate, and prior to activating an account, it must be reasonably satisfied that the applicant does not have an existing account registered with the Licensee, and that the player is otherwise still eligible to participate in the games.”*



### 3.3.3 MGA Expectations

If a player self-excludes from one brand due to problem gambling, this exclusion must be enforced across all brands operating under the same licence. Licensees are therefore expected to maintain systems capable of reliably identifying players who use the same or substantially similar identity details, ensuring that self-excluded individuals are prevented from creating or accessing accounts on any other brand within the same licensed group.

*Example: If a player is self-excluded on Brand B, all affiliated brands of the same Licensee should refer to the central database to reflect the self-exclusion on the other accounts and prevent account creation or gameplay.*

Licensees should also ensure that their systems are capable of detecting instances where players use identical or materially similar personal details. The system should generate alerts in circumstances that warrant enhanced due diligence, particularly where there is a risk that a self-excluded player is attempting to register a new account. Effective practices may include real-time identity checks at registration or first deposit, alerting on new accounts registered with similar or identical key identifiers such as name, date of birth, email address, home address, or payment methods, and using shared or linked payment details as additional verification. These measures help ensure that self-excluded players are consistently identified and prevented from circumventing responsible gambling controls across all brands operating under the same licence.

*Example: A Licensee may run the player's details such as name, date of birth, email, and payment method against existing accounts in the system. If the data matches an account that is self-excluded or flagged for responsible gambling concerns, the system should prevent the creation of a duplicate account or flag for a manual review prior to first deposit.*





### 3.3.4 Recommended Best Practices

- Where multiple brands or platforms are operated under the same licence, a centralised exclusion database should be maintained to ensure consistent enforcement across all channels.
- Robust KYC procedures should be applied at account registration or first deposit, including real-time data matching to identify previously excluded, at-risk, or potentially linked players. The Licensee may implement additional measures to determine whether to continue the business relationship with a player if there is evidence suggesting links to other accounts.
- As mandated under Article 11(1) of the Player Protection Directive (Directive 2 of 2018), when a player requests account closure or permanent closure, the Licensee shall ask whether this should be treated as a self-exclusion. If the closure is related to problem gambling or gambling harm,

a self-exclusion should immediately be set for the requested timeframe or longer, depending on the assessment undertaken by the responsible gambling team. Accounts under self-exclusion can only be reopened once the exclusion has expired or at the player's request, at the Licensee's assessment and discretion. Self-exclusions are designed to allow players to take a break from gambling, with additional steps in place to safeguard the reopening process.

**This approach helps bridge the gap between regulatory requirements and the practical identification of gambling harm, ensuring that self-exclusion is applied meaningfully when problem gambling is suspected.**

- When a player self-excludes, the Licensee should ask whether the exclusion is due to problem gambling. If the self-exclusion is initiated directly by the player through their account, a dropdown or similar option should be provided to indicate the reason. This information allows the Licensee to take appropriate measures, including extending the exclusion across all affiliated brands or accounts, to ensure comprehensive player protection.
- Payment methods utilised by self-excluded players can be flagged or prohibited from being used on other accounts.



### 3.4 Limits Not Offered Upon Registration

#### 3.4.1 Findings

- Four out of 20 Licensees failed to prompt or provide options to set responsible gambling limits upon registration or first deposit.

#### 3.4.2 Regulatory Requirements

**Regulation 14(3) of the Player Protection Directive (Directive 2 of 2018):**

*“Following the player registration process and in any case, before the player’s first deposit, B2C Licensees offering their gaming service online shall ask players whether they would like to set the limits referred to in sub-article (1). B2C Licensees shall ensure that the option to set limits remains available and easily accessible for the player to avail of at any time after registration, and shall immediately assist, by such means as may be available to them, players who express the desire of setting such limits”.*

#### 3.4.3 MGA Expectations

Licensees must ensure that players are presented with clear and accessible options to set personal gaming limits at key points, including registration and first deposit. Systems should proactively prompt players to consider setting limits, and the options must be easy to apply. Providing these tools at the outset helps players manage their gaming activity responsibly and mitigates potential harm.

Additionally, Licensees must ensure that access to setting personal gaming limits is readily available on the responsible gambling webpage, which should be accessible just one click away from any gaming webpage.





A photograph of two women in a professional setting. One woman, with long dark hair and a white turtleneck, is smiling and looking towards the other woman. The second woman, with long blonde hair, is seen from the back, wearing a light-colored blazer. They are sitting at a table with a laptop and some papers. The background is a bright, modern office with large windows.

#### 3.4.4 Recommended Best Practices

- Implement a mandatory prompt during registration or first deposit, asking the player to set responsible gambling limits.
  - Ensure that any limit set by the player or imposed by the Licensee takes effect immediately and is enforced without delay.
  - Keep limit-setting options continuously accessible through a clearly visible and dedicated section.
  - Ensure players can set or adjust limits instantly.
  - Provide explanations for each type of limit and its effect on play.
  - Remind players periodically that limit-setting remains available, without promotional framing.
  - Design alerts to be clear, unavoidable, and player-focused, which are not easily dismissed or hidden.
- Prompt players to set or review their limits when they return from a self-exclusion period, ensuring they can reinforce responsible gambling controls.
  - Proactively impose limits in cases evidencing concerns related to problem gambling.



### 3.5 Incomplete Information in Reality Check Feature

#### 3.5.1 Findings

- Six out of 20 Licensees necessitated further mandatory information in the Reality Check Pop-up tool.

#### 3.5.2 Regulatory Requirements

**Regulation 18A (2) of the Player Protection Directive (Directive 2 of 2018) states that:**

*“The alert made in terms of sub-article (1) shall suspend play, remind players to stay in control of their gambling, make readily available to the players statistics of the amount of time which the player has spent playing, the amount of money or money’s worth wagered by the player and the player’s winnings and losses during the relevant gaming session to which the alert refers”.*

#### 3.5.3 MGA Expectations

Licensees must ensure that, for repetitive games of chance determined by a random number generator, players are offered the ability to set timed pop-up alerts (“Reality Checks”). These alerts should pause gameplay, remind players to stay in control or display a responsible gambling message, and provide clear statistics on time spent, amounts wagered, winnings, and losses during the session. Where players wish to exclude auto-play or auto-spin times from the calculations of time displayed in the Reality Check pop-up, this must be an active opt-in choice and never the default. The alert must remain on screen until acknowledged by the player, and gameplay should not resume until confirmation is given.

The Authority has no objection to the Reality Check function being enabled upon player log-in rather than at the start of a gaming session, provided that the alerts display all details required under the Regulations. Furthermore, if a player sets a Reality Check interval (e.g., one hour), this must apply continuously across different games; the timer does not reset when a player closes and opens another game.





### 3.5.4 Recommended Best Practices

- Reality Check pop-ups should be enabled by default. Players should be provided with the functionality of opting out, rather than being opted in by default.
- Use automated controls to ensure compliance with all limits, including those set by the player and any additional limits imposed by the Licensee, so that they cannot be exceeded during play.
- Regularly review and test features for responsible gambling limits and Reality Check pop-ups to confirm they function as intended and comply with regulatory requirements.
- Acknowledgement of this information should not be taken as evidence that they are fully in control of their gambling; appropriate interventions may still be required if the player exhibits markers of harm.



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# Conclusion



The findings presented in this document reaffirm the Authority's ongoing commitment to safeguarding players and upholding the integrity of the online gaming sector. Overall, the Thematic Review indicates a positive level of compliance, with the majority of the Licensees assessed demonstrating practices that are broadly in line with regulatory expectations. While certain areas for improvement were identified among a limited number of Licensees, the review also serves as a constructive mechanism to support continuous improvement across the sector.

By outlining the relevant regulatory provisions, reaffirming the Authority's expectations, and offering practical recommendations, this document is intended to support Licensees in strengthening their compliance frameworks and enhancing the effectiveness of their player protection measures.

The Authority encourages all Licensees to treat these insights as an opportunity to critically assess their internal controls, address any gaps, and adopt a proactive approach to regulatory compliance.

Through collective effort and consistent application of best practices, the industry can continue to evolve in a manner that prioritises player welfare, operational resilience, and regulatory accountability.

Licensees are encouraged to discuss the contents of this document within their executive team and the relevant teams within their three lines of defence, to ensure that licensee-specific compliance efforts address the key areas that have been identified in this document.

For any queries relating to this document or other player protection-related matters, please contact the MGA at [info.mga@mga.org.mt](mailto:info.mga@mga.org.mt).

