

International Responsible Gambling Code of Practice

Purpose of this code

1. The international remote gambling industry and its regulators should be committed to the encouragement of:
 - high standards of probity and integrity within the betting and gaming industry; and
 - social responsibility within the betting and gaming industry, effected through various means including support for charities and initiatives to help those who have gambling problems.
2. The purpose of this code is to help regulators and gambling operators to achieve these aims in a consistent manner. It is intended for use in whichever jurisdiction the gambling operator is based in. For ease of reference an Executive Summary of this code is attached at the foot of this paper. Irrespective of where the customer is located, he or she should be provided with the tools to help them monitor and control their gambling behaviour.
3. Although the code primarily relates to internet gambling it is believed that the underlying principles hold good for all forms of remote gambling. It must be a code that is flexible and capable of development in line with any emerging best practice.

Compliance with Codes of Conduct

4. The need to demonstrate that a business is run in a socially responsible manner is an important aspect of regulation. Operators will also have their own rules and procedures designed to protect their businesses, enhance the customer experience and minimise harm to the vulnerable. It is therefore important that:
 - All relevant staff are made aware of, and understand, this code of practice; and
 - Due consideration is given to the code when company policies and procedures are being developed.

Underage Gambling

5. Even though in most jurisdictions it is illegal for anyone under the age of 18 to engage in betting or gaming, it is not always easy to ensure that children are excluded. Operators should adopt reasonable measures to minimise underage gambling. The primary tool for this is the use of age verification (AV) procedures.

6. It is acknowledged that many gambling operators already employ more checks than are cited here, but this code can stand as a benchmark against which they and others can be assessed
7. The key aim of undertaking AV checks is to ensure that all customers using remote gambling services are legally old enough to do so.
8. Age verification is, and will continue to be, an inexact science. It is expected that both regulators and the industry will work with various other bodies to try and get more reliable date of birth information made available. As and when that happens age verification procedures will become more robust, but it must be acknowledged that the availability and reliability of electronic evidence varies greatly from country to country. In some instances this means that gambling operators can do no more than make reasonable endeavours to ensure a new customer's exact date of birth.
9. Remote gambling operators are also strongly recommended to:
 - Make links available to, or provide adequate information about, reputable filtering services like the Internet Content Rating Association (ICRA) so that parents and others can take any necessary steps to prevent their personal computers being used for inappropriate purposes;
 - Make clear through messaging or the display of a 'no under 18s' sign on the homepage of the internet site that children are not permitted to gamble. A clear message to this effect should also appear during the registration process; and
 - Include a clear policy for dealing with underage gamblers.
10. The majority of on-line payment methods are only available to over 18s so offer very limited risk of under age gambling. Children do, however, have greater access to some forms of payment that can be used to fund remote gambling. It is sensible therefore to focus efforts on those payment methods that are readily available to children and indeed are targeted at them by the banks. Any form of pre-pay card would also fall into this category. For the purposes of this paper they will be referred to as '*high risk payment types*'.
11. As a minimum, AV must be undertaken for any customer who has not previously been identified as over 18 if they seek to register and gamble with a high risk payment type. This is irrespective of the remote gambling channel they are seeking to use (eg internet, phone, digital TV, WAP etc). It would also be good practice to perform the same level of checks on all potential customers who provide a date of birth of between 18 and 21 years old because industry experience shows that if someone who is underage seeks to register then they normally give an age which is close to their real age.
12. It is up to individual operators to choose a verification system best suited to their particular business model. Whichever they choose it must include an element of objective validation via a verification service, such as that provided

by companies like GB Group, Experian, or 192.com, or through direct access to reliable documentation, for example a passport or birth certificate.

13. AV checks should be initiated as soon as possible after a customer seeks to register using a high risk payment type.
14. All reasonable endeavours should be made to complete these AV checks with the minimum of delay. A maximum period of 72 hours will be allowed in which to verify the age of the customer. This will be known as the '*verification period*'.
15. Many checks are capable of completion well within the verification period, but there are cases, for instance where operators request further information by e mail, where the full 72 hours might be necessary.
16. During the verification period, neither the customer in question, nor the operator will benefit from any gambling activity that takes place. Against this background:
 - Customers may be able to deposit funds and gamble, however, they will not be able to withdraw any winnings until it is confirmed that they are adults; and
 - Any deposited funds must be available for prompt return if during this period, or at any later stage, it is proved that the customer is underage.
17. If after the verification period the operator has failed to verify that the customer is an adult then the account should be suspended.
18. The operator should then make all reasonable efforts to contact the customer to resolve the outstanding account issue.
19. If this leads to proof that the customer is an adult then the account can be re-activated.
20. If at any time a gambling operator becomes aware that a customer is underage, they will:
 - a. Suspend the account immediately;
 - b. Reverse all wagers that have taken place;
 - c. Refund the value of all deposits; and
 - d. Close the account.
21. Consideration should also be given as to whether any other bodies or agencies should be made aware of the child's interest in gambling, subject to data protection laws.

22. There is also merit in providing the underage customer with contact details for Gamcare or a similar organization which can provide advice and counselling.

Player Protection Measures

23. In order to prevent and combat problem gambling there are a range of measures that operators can take to help their customers. These include:
- Links from the site's home page to both the player protection and responsible gambling pages.
 - Links should also be readily available from any screen where game play may occur.
 - The social responsibility page should contain as a minimum; a message that gambling could be harmful if not controlled and kept in moderation; advice on responsible gambling and sources of help on problem gambling, including contact details; a 'self assessment' process to determine risk potential either on the page or via a link; a link to the player protection page if that is different; links to a filtering programme to enable customers to prevent children gaining access to gambling sites via their computers; and details of the company's social responsibility policy.
 - The player protection page information should contain the measures available (including customer led deposit limits and self exclusion facilities) to the customer.
 - Applications to set or decrease deposit limits should be dealt with as quickly as possible, but if a customer wishes to increase a previously set deposit limit then he should have to wait 24 hours to do so. This would act as a suitable 'cooling off' period.
 - Where available an up-to-date account balance will help customers monitor their spending.
 - Their gambling history should be available on request, dating back for a minimum of a month, including all deposits and withdrawals.
 - The current time, where displayed on the customer's computer, will help customers monitor the time spent gambling. If for any reason that is obscured by the gambling graphics then the operator should add an on-screen clock as part of the service.
 - The provision of a self-exclusion facility for any customers who wish to exclude themselves from gambling on the operator's website. During the chosen period the customer will also be excluded from all forms of communication from the operator. The chosen period should be for a minimum of 6 months. Reasonable steps should be taken to prevent promotional material being sent to a customer during the exclusion period.

- Either provide a self assessment test or a link to one (such as that on the Gamcare website) to help customers gauge whether or not they are developing a problem.
- Rules should be available about the gambling products that are on offer and those rules should not be changed during the course of a gambling event.
- Free play games should provide links to the same age restriction, responsible gambling and player protection information as those used by real money customers and the payout percentage for a particular game should be the same in free play mode as it is in the real money game.

Customer Communication

24. Without compromising the principle that customers are responsible for their own gambling, the nature of the activity is such that information should be made available to empower them to gamble responsibly. Related customer communication should therefore:
- Give clear guidance that in order for gambling to be a fun, social activity, the customer needs to ‘stay in control’.
 - Make information available about player protection and responsible gambling.
 - Indicate sources of help and how they can be accessed.
 - There should be easy and obvious methods on the site for customers to submit complaints or queries.
25. Gambling operators must be able to direct customers to sources of help where they can address concerns about their gambling should they wish to do so. The availability of such assistance can be brought to the attention of customers in the following ways:
- Displaying the logo of, and a link to, appropriate problem gambling organisations on the website’s home page.
 - The display of an appropriately worded link to the area of the website where sources of help can be found.
 - Providing an area of the website that sets out the operator’s policy, that emphasises the need to keep gambling under control and shows where to seek help should anyone be concerned about their own or someone else’s gambling.
 - By having staff who can supply such information and contacts (see staff training below).

Staff Training

26. Training on social responsibility and problem gambling should be available for all customer services and other relevant staff. The aims of such training should be to raise the awareness of these issues for frontline staff who deal with gamblers. Working with problem gamblers is a specialised skill and it would be wrong and potentially dangerous for staff in the gambling industry to seek to fulfil any part of that role, however, they should be fully appreciative of their companies' policies and able to refer suitable cases to external bodies that are in a position to provide qualified help and counselling. In order to do so effectively they will have to be equipped to deal with any indications from customers that they are in need of advice or assistance to help them to deal with a potential gambling problem.

Advertising and Promotion

27. It is appropriate that gambling activities are advertised and that an operator is able to promote the facilities available. Any such advertising and promotion must comply with the laws, regulations, and any relevant codes of practice of the jurisdiction in which the operator is licensed.

General Principles

- Advertisements should be legal, decent, honest and truthful.
- Advertisements should be prepared with a sense of responsibility to consumers and to society in general.
- Promotional email should only be sent in accordance with relevant regulations and legislation.
- No advertisement should bring the advertising industry into disrepute.
- Advertisements and promotions should be socially responsible.

Betting and Gaming specific

- Care should be taken not to exploit the young, the immature or those who are mentally or socially vulnerable.
- Advertisements should not be directed at people under the age of 18 through the selection of media, style of presentation, content or context in which they appear.
- Persons portrayed gambling should not be, nor appear to be, under 18.
- There should be honesty at all times with regard to the chances of winning, and the odds or payout ratio that applies to the gambling on offer. Free play games should operate to the same payout ratio as cash games.

- Operators should always gain permission before carrying any 3rd party logo (e.g. the Gamcare logo should not be used without its consent) and ensure that logos and links are valid and appropriate.
- Consumers should be offered advice about the gambling facilities on offer. It should not encourage them to re-stake their winnings; increase the amount they have decided to gamble; chase their losses; continue gambling when they have indicated that they wish to stop; or enter into continuous play for a prolonged period of time.

Conclusion

28. Gambling is a mainstream leisure activity for adults. For the vast majority of customers it is a harmless pursuit, but all socially responsible gambling operators must be mindful of the problems that can develop and, of course, it is never acceptable for a child to be able to take part in any adult gambling activity.
29. Although no procedures can ever be foolproof, operators should empower their customers to help them ensure that their gambling does not become a problem and that, if they fear it might be, there is information available for them about sources of support and advice.
30. In addition, regulators and the industry should continue to work with all interested parties so that its members can be kept fully informed of any new practices or procedures that might be useful in combating problem gambling, helping problem gamblers, and preventing children from gambling.

RESPONSIBLE GAMBLING CODE

EXECUTIVE SUMMARY

UNDERAGE GAMBLING

- Sites should implement security measures to prevent access to gambling products by underage players. [5]
- The homepage of a site should clearly display a ‘no under 18’s’ sign, which links through to a clear message about underage play. [9]
- The registration process should include a clear message regarding underage play. [9]
- The site’s responsible gambling page should provide a link to a recognised filtering programme to enable players/parents to prevent minors from accessing gambling sites. [9]
- Sites should post a clear policy for dealing with underage players. [9]
- A legal disclaimer should be displayed on the site that states that no player below the legal age of gambling is legally permitted to participate in internet gambling. [9]

PLAYER PROTECTION MEASURES

- The site’s homepage should contain a clear link to the Responsible Gambling Page, which should contain the following; [23]
 - A warning that gambling could be harmful if not controlled and kept in moderation,
 - Advice on responsible gambling and a link to sources of help on problem gambling, including helpline numbers,
 - A link to an accepted and simple self-assessment process to determine risk potential,
 - A list of player protection measures that are available on the site and access to these measures,
 - Details or a link to the site’s responsible gambling policy.
- Any downloaded gaming software should contain a clear reminder to the player about responsible gambling, and a link to the responsible gambling page. [23]
- Self-Exclusion [23]
 - A player should be given the opportunity to self-exclude.
 - Procedures for self-exclusion should be clearly communicated to players on the website.
 - Self-exclusion should be for a minimum period of 6 months.
 - The site should also provide players with a ‘cooling off’ exclusion option.
 - Sites should take reasonable steps to ensure that a player who has used the self-exclusion option does not receive any promotional material during the exclusion period.
 - Once a player has selected the self-exclusion option, the account should be locked and any funds in the account paid out.
- Deposit Limits [23]
 - Players should be able to set their own deposit limits.
 - Sites should have systems in place to deal with deposit limit requests promptly.

<ul style="list-style-type: none"> ➤ If a player wants to increase a deposit limit previously set, there should be a minimum wait of 24 hours. ➤ A request to decrease a deposit limit should be with immediate effect.
<ul style="list-style-type: none"> • Reality Checks [23] <ul style="list-style-type: none"> ➤ A clearly visible clock should be available on the screen at all times. ➤ The denomination of each credit should be clearly displayed on the games screen.
<ul style="list-style-type: none"> • Player Accounts [23] <ul style="list-style-type: none"> ➤ Players should be able to access their account history dating back for a minimum period of 1 month, including all deposits, withdrawals and wagers.
<ul style="list-style-type: none"> • Free Play [23] <ul style="list-style-type: none"> ➤ The free play games site should provide links to the same age restriction, responsible gambling and player protection information as the real money site. ➤ The payout percentage for a particular game type in free play mode should be the same as the real money game.
<ul style="list-style-type: none"> • Game Fairness [23] <ul style="list-style-type: none"> ➤ Game rules should be made available to the player. ➤ A game should follow a constant set of rules and shall at no time deviate from those rules. ➤ 'Near-miss' game results should not be falsely displayed, by substituting one losing outcome with a different losing outcome.

CUSTOMER COMMUNICATION

<ul style="list-style-type: none"> • Where convenient, direct communication with the player should carry a responsible gambling message as a footer. [24]
<ul style="list-style-type: none"> • Messages of site's support of responsible gambling should not be misleading. [24]
<ul style="list-style-type: none"> • Player Disputes <ul style="list-style-type: none"> ➤ There should be an easy and obvious method on the site for players to submit complaints. [24]

TRAINING

<ul style="list-style-type: none"> • Appropriate personnel should be trained on the issues of problem gambling and refresher courses undertaken as and when needed. [26]

ADVERTISING AND PROMOTION

<ul style="list-style-type: none"> • Advertising and promotions content should be within the spirit of responsible gambling. [27]
<ul style="list-style-type: none"> • The placement and content of adverts should not target those under the age of 18. [27]