



Safer Gambling Commitment V: Creating a culture of safer gambling

**BGC Employee Safer
Gambling Policy Guidance**

INTRODUCTION

In November 2019, the UK's leading gambling operators announced a series of Safer Gambling Commitments. The Betting and Gaming Council Members agreed as part of improving the culture of safer gambling all participating operator companies should introduce an appropriate Employee Safer Gambling Policy including internal and external training programmes to build awareness, capability and capacity on Safer Gambling practices and standards across the workforce to support colleagues in identifying indicators of potentially harmful play and to make available confidential employee assistance and support information.

This paper is intended as a template to provide guidance for Members when developing their own company Employee Safer Gambling Policy.

GUIDANCE TEMPLATE FOR EMPLOYEE POLICY STANDARDS AND SCOPE

1. Statement of intent and principles towards gambling by employees

- 1.1. The Purpose of the Policy, a clear statement to inform purpose what it is / is not.
- 1.2. The Company's approach to gambling by employees, the use of gambling products in the workplace.
- 1.3. Support and guidance for those who may be concerned about their own gambling or that of a colleague.
- 1.4. To whom the policy applies within the company and whether the Policy extends to temporary workers, contractors.

2. Gambling in the workplace

- 2.1. If gambling is permitted in the workplace, what activity is permitted and under what circumstances
- 2.2. If use of gambling products is required as part of an employee's role, under what circumstances.
- 2.3. If gambling is permitted by employees on company accounts, whether the company distinguishes between digital and retail products.
- 2.4. Monitoring the company applies to employee company accounts and any differences arising with scrutiny applied to customer accounts.
- 2.5. The treatment of information obtained through tracking and monitoring employee betting activity; what data is recorded about an employee's gambling on a company account.

2.6. Data privacy, retention, the company's obligations in extending its duty of care (ICO compliant).

3. Conflicts of interest (aligned LCCP requirements Code 7)

- 3.1. Governance and legal risk, employee roles and access to market pricing data.
- 3.2. Company's protocols and response to identified suspicious employee gambling activity or allegations of improper conduct with regards to the exploitation of privileged information
- 3.3. The availability of promotions and incentives to staff, in particular those that may require them to open a company account (where permitted).

4. Protocols and process to be followed by an employer where concerns arise about an employee's gambling

- 4.1. The definition applied by the company in identifying problem gambling and gambling-related harm, what it considers to be a welfare concern and the triggers it will observe to intervene.
- 4.2. Consent by the employee to retention of information about their gambling and any concerns raised regarding the employee's welfare.
- 4.3. Protocols to be followed in the event an employee is flagged by internal monitoring and controls relating to their own company gambling account (where permitted) including any divergence of treatment of employees and customers.
- 4.4. The rights and consents needed by the company to enquire and request additional information about an employee in order to inform welfare concerns regarding the employee's gambling e.g. personal and financial information (ICO compliant).
- 4.5. The treatment of information gathered by the company (guided by ICO) in the process of assessing welfare concerns relating to employees' gambling, accountability and governance to inform assessment and employee interaction.
- 4.6. Company action, response if it believes the welfare of an employee is at risk as a result of gambling on their account (where the company permits), protocols to include safer gambling limits, account closure.
- 4.7. Safeguarding protocols in the event of risk of harm to self or others.

5. Self-exclusion and Support

- 5.1. The Company's approach to promoting self-exclusion in the workplace, support, access.
- 5.2. Signposting in the business, digital and paper display, easily accessible internal and external sources of confidential problem gambling support and advice and independent employee assistance programme, to include but not limited to:
 - **GAMSTOP** online self exclusion: www.gamstop.co.uk
 - **MOSES** land based betting self exclusion: www.self-exclusion.co.uk
 - **SENSE** land based casino self exclusion: info@senseselfexclusion.com
www.bettingandgamingcouncil.com/sense-self-exclusion-scheme
 - **Bingo:** www.bingo-association.co.uk/self-exclusion
 - **Arcades:** www.bacta.org.uk/self-exclusion
 - **GamCare** www.gamcare.org.uk
National Gambling HelpLine confidential 24 hour support Freephone **0808 8020 133**
 - Employee Assistance contact details, confidential, independent of the company.
- 5.3. Guidance should an employee request to self exclude from a company account including confidentiality undertakings
- 5.4. Process and protocols for employees seeking to return to gambling / re-open a company account (where permitted)

6. Training and Awareness

- 6.1. Provision of employee safer gambling training, problem gambling awareness and support programmes at induction and timely refresher.
 - 6.2. Guidance for employees on how to identify potential problem gambling in the workplace, the protocols, processes and confidentiality protections involved in alerting the company should such concerns arise about a colleague.
- ## 7. Governance
- 7.1. Responsibility to update and maintain the policy, include [Title] is responsible for promoting, supervising and coordinating compliance with this policy.
 - 7.2. The policy will be reviewed on at least an annual basis with any changes being circulated for review and approval by [titles]
 - 7.3. This policy will be available to view and download from [location /link]
 - 7.4. This policy is required reading for all Directors, Managers and Employees.