



# Casino Sector Code of Conduct Player Protection - Slots

## PURPOSE

**The casino sector slots player protection code of conduct (“the code”) serves as an important guidance document for uk licensed land-based casino operators. It describes the values needed and methods to be applied by bgc land-based casino sector members when implementing daily business operations in order to comply with the code and sets out how slots player protection measures should be managed.**

The code provides a framework that enables operators to demonstrate that they are committed to protecting slots players from gambling related harm and provide an environment that allows them to gamble safely.

## GUIDING PRINCIPLES

While slots are a source of fun and enjoyment for most players, this Code recognises that harmful slots play can also cause social, personal and financial issues for some. To aid the prevention of these harms, all operators are required to develop appropriate policies and procedures to minimise the risk of harm.

**These policies and procedures should reflect the following key principles:**

**Inform** - safer gambling information and tools that are easily understood and accessible. Displays and literature in the casino, and on websites (where used), that promote responsible play. This should be done in line with GamCare Codes for the Display of Safer Gambling Information. Employees with appropriate knowledge to support slots players in making safer gambling choices.

**Identify** - effective systems for the early identification of harmful slots play and assessment of how much at-risk players can afford to play. Employee training that includes how to spot indicators of problem gambling risk.

**Interact** - communication with players that is based on identified levels of risk and is delivered through all available means of communication.

**Monitor** - ongoing monitoring of players identified as at-risk, and defined processes for those who continue to exhibit signs of harmful play or spending beyond their means.

**Support** - signposting the help & support available for players who believe they have, or are identified as at-risk of having, a gambling problem.

**Evaluate** - perform ongoing reporting and evaluation to inform operators of customer responses to the Code measures.

This Code applies to all slots players to ensure that operators are doing all that they reasonably can to identify indicators of harm as early as possible and assist players in correcting their behaviour and stay in control.

The realisation of the principles of this code will drive a consistent standard in creating safer gambling environments across the land-based casino sector.

## MINIMUM STANDARDS

Safer gambling occurs in an environment where the potential for harm associated with gambling is minimised and players can make informed decisions about when and how much they should gamble. To achieve this for slots players, and uphold the values of this code, operators need to meet the following standards:

- Operate with safer gambling policies that specifically include how they intend to protect slot players from gambling related harm.
- Make adequate information, assistance and resources available to effectively support the development, implementation and maintenance of safer gambling policies.
- Have leaflets signposting sources of help and ensure all machines display GamCare (or similar) and National Helpline contact details for Safer Gambling information.
- Develop and provide safer gambling training to all employees that is specific to each employee's role and addresses the problem gambling risks associated with slots play.
- Ensure that all new slots games adhere to the Land-based Responsible Game Design Code, once published, and have been fairness tested by an independent test house.
- Offer safer gambling tools that can be accessed through slot machines, such as the ability to set limits.
- Provide safer gambling information that can be accessed through slot machines.

- Operate with a form of player monitoring that recognises the markers of harm associated with slots play (e.g., chasing losses).
  - Marketing communications and offers for slots players that have been suitably reviewed to ensure that they are compliant with advertising and marketing standards.
  - Exclude identified self-excluded and those identified as at-risk slots players from marketing communications.
  - Never allow commercial pressures to override welfare considerations in respect of a slot player's gambling activity.
  - Develop slots safer gambling key performance indicators and reporting systems that provide adequate oversight to senior management.
  - Operate with an identified person at board or executive management committee level who is a Gambling Commission personal management licence holder that is accountable for compliance with this Code.
- If a player elects not to set a limit, default automatic monetary and time alerts/reminders (sometimes known as reality checks) will occur on the machine during the session, where machine functionality permits.
    - Players will be presented with fixed time and monetary alerts, which will require to be acknowledged to continue play, during a slots session.

**Land-based casino operators are also required to commit towards the following measures:**

- Slot machine safer gambling messaging – outside of game play, at least 20% of slot machine top screen imagery to be dedicated to safer gambling messaging, where game and machine functionality permits. A 'top screen' is defined as an upper screen or an upper area of screen that is not part of the game play area. This requirement can be met either via dedicating 20% of total top screen time to Safer Gambling messaging or via ensuring that 20% of each image is dedicated to Safer Gambling messaging.
- Customer help pages and leaflets – easier access and clearer information on help pages and leaflets to enable players to understand concepts such as 'return to player' (RTP) and how to use limit setting options (and comply more widely with the Land-based Responsible Game Design Code when published).
- Safer Gambling messaging on slot machine receipts (referred to as TITO) to promote safer gambling and advice on staying in control, including the National Helpline phone number.
- Evaluation of the effectiveness of slots player protection measures by conducting regular reviews to ensure slots protection measures are effective, including impact evaluation to test safer gambling measures.

It is recognised that not all operators are currently in a position to meet all of the standards outlined in this section. All casino operators will adopt these standards no later than January 2023.

**KEY COMMITMENTS**

The Code's minimum standards are designed to ensure that operators provide slots players with a high level of protection, but it is also evolutionary and encourages operators to continue to explore and develop new harm minimisation strategies.

**The key objectives that all operators are required to meet are:**

- Offer every player the ability to set personal monetary and time limits on B1 machines (e.g., in session limits or account-based limits)
  - Players will be required to set time and/or monetary limits before commencing a slots session. This includes an option for players to set no limit.
  - For those using account-based limits, this prompt to set a limit is required at the start of the first session of the day.
  - Where a slots player is a member of an operator's loyalty scheme, they should be provided with the option to set daily, weekly or monthly monetary and time limits to support them in monitoring play across more than one session.
  - Default limit and alert values should be consistent across all machine suppliers. Machines will show default limits of £250 loss and 60 minute play time, unless individual operators notify the Commission otherwise.

## **GUIDANCE ON HOW TO REDUCE THE RISK OF HARM FROM SLOTS PLAY**

- ✓ Provide safer gambling information to slots players through player loyalty scheme communications - how to gamble safely and stay in control.
- ✓ Ensure affordability data held for identifiable slots customers is used for risk assessments and taken into account in interactions.
- ✓ Work with machine suppliers to develop machine-based player protection measures and promote safer gambling through slot machine screen messaging.
- ✓ Utilise customer management systems to capture and track slots player data. Employ manual monitoring processes aimed at capturing player data for those at the highest risk of harm. Apply enhanced monitoring for higher risk slots players.
- ✓ Include slots player protection measures, indicators of problem gambling and how to interact with slots players exhibiting signs of problem gambling in staff training programmes. Provide enhanced training for those roles that would work with slots players more regularly. Review slots safer gambling training annually and refresh as required.
- ✓ Consult external stakeholders, e.g., GamCare, when developing slots player protection tools and safer gambling policies.
- ✓ Collaborate with other operators and the BGC in the development of slots player protection policies and procedures.
- ✓ Make safer gambling information in leaflet form readily available in slots gaming areas of the casino and more discreetly elsewhere.
- ✓ Promote safer gambling and staying in control on at least one permanent display in each casino - either via tv screens or posters located in or close to slots gaming areas.
- ✓ Include slots player protection safer gambling information on operator websites where websites are used to advertise land-based casino facilities.
- ✓ Encourage slots players to take regular breaks.
- ✓ Provide clear product information on slot machines. Ensure that employees in roles that service slots players have a clear understanding and can explain how different slots games work.
- ✓ Prevent targeted slots marketing communications or offer bonuses and incentives to slots players identified under the age of 25, or any other slots player identified as being at-risk.

- ✓ For High Value Customers - only offer incentives or rewards to high value slots players who have passed the mandatory checks required to qualify for an HVC rewards programme as per the Gambling Commission's High Value Customers Industry Guidance and the BGC HVC Code of Conduct.
- ✓ Respond to requests for assistance from family and/or friends concerned about a slots player's gambling behaviour.
- ✓ Ensure adequate checks and risk assessments are conducted for players requesting debit card facilities or increases to already agreed debit card facility limits.
- ✓ Treat customer complaints relating to slots play losses as a possible indicator of problem gambling.
- ✓ Refresh slots player protection staff training at least annually.

## **COMPLIANCE WITH THE CODE AND FURTHER DEVELOPMENT**

**All BGC Casino Sector members are required to know and follow the Code.**

Operators should be able to demonstrate that the policies and procedures required to comply with this Code are within the scope of their internal regulatory compliance governance and risk management processes.

This Code will be kept under review and full re-assessment will be conducted within 6 months of the output from the independent evaluation. As the industry's understanding of the causes of problem gambling and appropriate responses further develop, this Code will be further reviewed and updated over time.

As of July 2022, there are a small number of legacy machines across the casino estate (<5% of all machines), which cannot be adapted to permit certain functionality. It is expected that these legacy machines will be phased out over time (many by the end of 2022). Subsequent reviews of the Code will track the number of legacy machines.

## **COMPLAINTS PROCESS**

**Complaints and breaches of this Code are dealt with by the BGC. The full complaints process is available to view on the BGC website.**



# Bank Transfer Block Project

**Most major consumer banks offer opt-in gambling blocking tools which prevent card payments to gambling firms based on their merchant category code. However, there are concerns that there are ways to circumvent these tools, for instance by using payment methods which are not covered by the block. One such way to circumvent this block is to transfer money directly to an operator's customer funds account.**

The BGC is working with the financial sector to develop a solution to this issue, in the form of a simple registry of the account details (such as sort code and account number) used by operators to receive bank transfer deposits. This secure list of account details will be provided to banks to integrate into existing blocks to automatically block transfers. This will help limit the ways that those who have taken the decision not to spend money on gambling can do so.

The BGC is working with willing banks to implement bank transfer blocks, and continue to develop solutions for other payment methods such as e-wallets and open banking initiated faster payments.