



BGC Code of Conduct: Game Design

INTRODUCTION

As part of the Safer Gambling Commitments announced in 2019, members of the Betting and Gaming Council (BGC) have undertaken a review into the design of gambling products to ensure that safer gambling principles are fully incorporated into industry games.

The result of the review is this inaugural Game Design Code of Conduct which demonstrates the industry's commitment to embracing positive change to enhance player safety through responsible game design.

We intend for this Code to be a living document, evolving as the research base and understanding around game design continues to develop. Part of this long-term work will include the areas we have set out for inclusion in the BGC Innovation and Testing Lab.

Further areas will be brought into the lab as they arise, and findings of this work will contribute to building subsequent iterations of the Code. The Code also sets out key principles and commitments that can be adopted by the industry in the following areas:

Game Characteristics

Working with academics, regulators, consumers, individuals with lived experience of gambling related harm and other technical experts to identify and agree on features that are correlated to greater player risk.

Informed Player Choice

Empowering customers to play more safely through the provision of clearer information on product and game rules, including mathematical properties such as risk, the chances of winning and optimal strategies.

Enhancing Control Innovation

Improvements in safer gambling tools that help players both monitor and control their gambling, including spend, loss, win and time-based measures.

Governance and Continuous Improvements

Process for reviewing and updating any Code of Conduct, in addition to transparency, disclosure and independent evaluation.

The industry recognises that there are a range of areas where the sector needs to evolve and address concerns surrounding player safety and to elevate safer gambling tools. This Code represents our members' long-term commitment to those aims and to responsible game design.

PRINCIPLES

The principles below reflect best practice already being undertaken by many BGC members and aim to instil a minimum set of standards in the Industry's approach to responsible game design. Embedded within these principles is a commitment to transparency, player education, innovation and research with the overarching aim of enhancing player safety. These principles also set out how the Industry will seek to review and improve the Code over time as our research and understanding of game design evolves.

1. A dedicated BGC committee, focused on Industry Sustainable Product & Game Design comprised of experts from product, technology and game studios, will review and adapt this Code on an ongoing basis.
2. We will conduct industry research and follow an evidence-based approach to development. Where there is evidence to suggest that a feature is strongly correlated to player risk of harm, the Industry will take action to mitigate the risk.
3. We will collaborate with academics, regulators, consumers, individuals with lived experience of gambling-related harm and other experts to identify risk and best practice.
4. Where we develop innovative game features or elements, we will review them internally and identify any safer gambling considerations, such as supporting post-release evaluations in collaboration with the B2C operators who have access to player data. The governance and methodology will be defined through the BGC Innovation and Testing Lab.
5. We will be transparent in the reporting of findings from the BGC Innovation and Testing Lab, including external scrutiny of our methodology and data.
6. The industry will provide information to our partners and players which clearly explains how products work and encourage safer play. This includes ensuring that games are designed to be clear and transparent to players and do not mislead players about likelihood of winning or how they work.
7. Game operation and rules, including best strategies, must be clearly set out and readily accessible to the customers.
8. We will enhance the accessibility of safer gambling tools to help players both monitor and limit their gambling including spend, loss, win and time-based limits on a per player account and time period basis.
9. We will look to innovate and build new safer gambling products and features and improve the level of control offered to players whilst gambling.
10. Games will be designed and tested robustly to ensure they operate according to these standards and provide players with fun and fair games that they can trust.
11. We will ensure our games do not target people under the age of 18.
12. We will continually monitor the processes and technology used to prevent access to our platforms by vulnerable people. We will strengthen these controls where we identify more robust and effective solutions.
13. We will ensure the marketing and terms and conditions of games are clearly explained and do not mislead players.
14. Industry will formally review and republish these principles and specific proposals periodically, recognising that the research base and player requirements around sustainable content are continually developing. We expect these principles to be continuously improved.

BGC STANDARDS

The following Code Standards are split into two phases of delivery and apply to online slots products.

PHASE 1

The following standards represent measures BGC members have committed to having in place by 30th September 2020. These commitments have been reflected in the recent Gambling Commission consultation on online slots which seeks to ensure these measures are adopted by the whole industry.

Minimum game cycle speed of 2.5 seconds

A game cycle starts when a player has paid for an initial wager and depresses the 'start' or 'spin' button or takes equivalent action to initiate the game and ends when all money or money's worth staked or won during the game has been either lost or delivered to, or made available for collection by the player and the start button or equivalent becomes available to initiate the next game. Where auto play or auto start is permitted then a game cycle is measured from the point at which the game is initiated by the system (equivalent to the player depressing the start button) to the point at which it is able to automatically start the next game.

Removal of turbo play

Turbo play or equivalent features will be not be allowed. Such features enable the player to speed-up the base game cycle speed of the game.

Removal of base game slam stops

Slam stops or equivalent features will not be allowed within the base game. This is the ability for the customer to interact with the base game to end it before it has naturally concluded e.g., by hitting or pressing a button whether online or on a physical machine. This includes promotional free wagers paid for by the operator.

Removal of multi-slot play within a single gaming client

Functionality that allow players to place multiple, separate stakes on multiple slots games within a single gaming client will not be allowed.

PHASE 2

In addition to our Phase 1 standards, BGC members have also committed to implementing a range of additional measures over the coming months as part of our Phase 2 commitments for online slots. These measures will enhance the transparency of games to players, both in the display of wins and clarity of game features, as well as adding friction and reflection to gaming sessions.

Members have been already been working to implement our Phase 2 commitments and have identified a number of measures which can be in place for new games by **31st January 2021**. These include measures which will enhance both transparency and add friction for players.

JANUARY 31ST IMPLEMENTATION

Wins below the stake size

Total wins below the stake will be informative and will be differentiated from wins that are equal to or greater than the stake. Specifically;

- The win amount will be displayed
- The win line is displayed long enough for player to understand the impact of the bet (in line with existing RTS 7E)
- A brief sound can be used to make the player aware of the result (the return of funds to wallet)

In contrast, total wins equal to or greater than the stake may be celebratory and allow the following elements

- The win amount can be displayed in a differentiating manner e.g., the win display could be in a text size that is greater and could utilise dynamic win animations, for example coin showers
- The win line can be displayed with additional animation permitted
- Celebratory sound effects can be used.

Bonus game notifications

Bonus games outside the base game will not be automatically triggered without a customer intervention, e.g., clicking a button to acknowledge that a bonus game has been won and can now be entered. In addition, after the end of a bonus game, the player will receive a notification informing them the bonus game has finished before re-entering the base game. If Auto-play is used during the bonus game, it will automatically stop before re-entering the base game. In the exceptional case that a bonus game is not triggered before the platform would normally time out, the operator has the right to clear down the game with any winnings being added to the player's balance.

Members have also committed to additional measures around easier player access to safer gambling information, adding friction via mandatory player interactions for time played and significant restrictions in the use of auto-play. Timescales for implementation of these measures will be agreed in the coming months.

FOR FUTURE IMPLEMENTATION

Access to safer gambling information

While a player is playing a game, the display will include a link to safer gambling information that will be available to view within a prominent place on the gaming client. This will display a safer gambling icon and messaging and contain links to the customer account pages of the operator, with quick links to all limit setting functionality (e.g., deposit, loss, time, timeouts, and self-exclusion).

Mandatory player interaction

A mandatory player interaction will be initiated every 60 minutes or at the conclusion of the subsequent game cycle. This will require the customer to acknowledge the message.

BGC MEMBERSHIP - ADOPTION OF THE CODE

The Betting and Gaming Council is committed to setting the highest industry standards and welcomes that our members are leading in doing so through their commitment to this Code.

The above Phase 2 standards will be implemented in line with the timeline outlined. Following a period of evaluation, the BGC may adjust these measures or recommend to the Gambling Commission that these standards are adopted as part of the RTS.

In the interim, compliance with the Code will be undertaken by members, including where operators use non-BGC game suppliers.

INNOVATION AND TESTING LAB

As part of our commitment to following an evidence-based approach to development of our Code measures, we have identified a work programme for the BGC Innovation and Testing Lab to inform future changes.

Our priorities and approach reflect that, while we recognise change is needed, measures must be targeted, enhance player understanding and mitigate against unintended consequences.

BGC members have committed to exploring the following areas, with projects to be launched during 2020. Projects will be independently validated and, in line with our Code principles, we will be transparent in the reporting of our findings, methodology and data.

Game labelling

Industry will undertake a project to assess the feasibility of developing more consistent approaches to providing slots game information to the player. This is in order to increase player understanding of key terms and enhance the player experience through the selection of the right entertainment for the customer.

We will aim to achieve the following objectives:

- Contribute to work on the creation of a consistent safer gambling icon to access game information and help pages
- Creating a common game labelling scheme for key features such as volatility and persistence features

A Game Labelling project has already been launched as part of the Innovation and Testing Lab in conjunction with the BGC Game Design working group.

Increased staking

The Industry recognises that, at present, there is little evidence regarding the prevalence of increased staking by players during slots sessions. To support greater understanding, the Industry will undertake a project to assess the prevalence of increased staking in slots sessions and whether this behaviour correlates to a risk of harm.

We will aim to achieve the following objectives:

- Gain greater understanding of the prevalence of staking up and the circumstances in which this takes place
- Where this occurs, establish whether this behaviour contributes to a risk of harm
- Where risk of harm is identified, assess how safer gambling messaging can be incorporated to enhance player safety

Preliminary work on this area is currently being undertaken.

Auto-play

The Industry recognises that there is a need for greater evidence on the use of auto-play in terms of its impact on speed of play, limit setting and player control. We also recognise the need to gain greater understanding of how this feature is used by players and whether this correlates with players exhibiting Markers of Harm.

The BGC has committed to building on the good work already undertaken on this issue by the Remote Gambling Association to build a picture of how auto-play is used and whether any risk mitigation is required through a restriction to auto-play or additional player safeguards in addition to those measures already committed to in Phase 2. We will report preliminary findings by the end of January 2021.

As a result of this work, we will aim to achieve the following objectives:

- Assess the number of players using auto-play
- Gather evidence on the relationship between auto-play and staking behaviour
- Review the correlation between use of auto-play by players exhibiting Markers of Harm

Display of net position and elapsed time

BGC members support the principle behind the Commission's proposal in the online slots consultation to provide players with quick access to information on their spend and time played. However, in order to ensure that the information provided to players provides the most benefit the BGC will review the options for displaying net spend and the time elapsed. This will consider the technical issues involved as well as evaluating the benefits of providing this information to players for individual slot sessions or for their gambling activity as a whole.