

GamCare Industry Code for the Display of Safer Gambling Information

(Gambling Websites and Apps)

1st Edition March 2021



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Background

- Everyone deserves to have easy access to straightforward, well signposted tools and support, in order to prevent the development of gambling problems or get support should they already have arisen. This Code, developed in consultation with the Betting and Gaming Council (BGC) and a number of businesses directly, provides an outline of the minimum standards that the public should expect to find when engaging in online gambling.
- 2. It is an attempt to draw on good practice from within the gambling sector, as well as others, to form a baseline standard from which to continue to develop and improve. Whilst it is not a legal requirement of businesses to adhere to this Code, adherence can be assumed as a commitment of that business to seeking out a better experience for customers.

Introduction

- 3. GamCare's Industry Code for the Display of Safer Gambling Information (Gambling Websites and Apps) was published in March 2021. It provides businesses with a range of measures to improve the display of Safer Gambling information on gambling websites and apps. The Code recognises that businesses are already making considerable progress in this field, but also that more can be done to increase accessibility and awareness of tools and support options for customers. The code covers:
 - a. Placement of Safer Gambling information within a website or app.
 - b. Brief principles on Safer Gambling messaging.
 - c. Access to Safer Gambling tools or controls.
 - d. Minimum content requirements for Safer Gambling sections or microsites.
 - e. Information on displaying Safer Gambling information in website or app footers.
 - f. Updating of Safer Gambling information.
 - g. Presentation of Safer Gambling information.
 - h. Information provided to customers upon self-exclusion.
- 4. Code signatories commit to four principles which will guide and determine the spirit in which they implement the Code. These are:
 - a. Code signatories acknowledge that their customers have a right to receive Safer Gambling information when using their online products.
 - Code signatories have a collective ambition and responsibility to making Safer Gambling information more prominent, visible and easily accessible to all customers, irrespective of risk profile.



- c. Code signatories collectively commit to presenting Safer Gambling information in such a way that customers using websites or apps, will be actively signposted to Safer Gambling management controls and standardised support information, including a link to begambleaware.org and the National Gambling Helpline.
- d. Code signatories will evaluate the changes they make under this Code and ensure that impacts on customer behaviour are documented and learned from.
- 5. The Code aims to prevent gambling-related harm amongst the general population. It covers general Safer Gambling communications aimed at all customers of online gambling products in Great Britain, irrespective of risk profile and would be in addition to any communications or interventions targeted at specific segments of customers who are, for example, displaying signs of gambling-related harm.
- Whilst the Code focuses on explicit signposting, it is acknowledged that implicit
 signposting by businesses is equally important, as this will ensure that Safer
 Gambling tools and support are viewed as a normal part of the online customer
 journey.
- 7. Businesses should note that this code is designed to complement and sit alongside existing regulations and industry codes.
- 8. This Code does not cover gambling marketing or advertising, which is addressed through separate regulatory and advisory codes of practice such as the Industry Group for Responsible Gambling (IGRG) Code for Socially Responsible Advertising.
- 9. This Code takes into account that businesses work across a range of platforms and systems. It assumes that Safer Gambling information will most commonly be found in the following areas of a site:
 - a. The customer's account section.
 - b. A separate Safer Gambling section or microsite.
 - c. The site terms and conditions.
- 10. Businesses who are already meeting the standards in this Code are expected to go further to trial new approaches and to share learning with the wider industry. The spirit and intent of this Code is clear and gambling businesses will be expected to make **noticeable** changes to improve **immediate** visibility of, and access to, Safer Gambling information for all customers, irrespective of risk profile.

Placement of Safer Gambling information within website or app

11. In the spirit of the Code, the business **shall** ensure that Safer Gambling information is **prominent**, **visible** and **easily accessible** to all customers within their website or app. 'Prominent' is broadly defined as being easily visible and displayed in such a way as to come to the immediate attention of those viewing the page, irrespective of their risk profile. Footers are not considered 'prominent' and are covered separately by <u>clause 27</u>.



- 12. Businesses **shall** ensure that the following three items of Safer Gambling information are prioritised for 'prominent' display:
 - a. A link to the business's Safer Gambling section or microsite.
 - b. A link to the begambleaware.org website.
 - c. The National Gambling Helpline number (0808 8020 133) with a link to www.gamcare.org.uk/talk-to-us-now/.
- 13. Businesses **should** use agreed logos to display the information in clause 12 where practicable, ensuring the text in each logo is clearly legible and follows specified guidelines for usage:
 - a. When linking to the business's Safer Gambling section or microsite businesses use the Safer Gambling icon which will be available for download from the BGC website soon: www.bettingandgamingcouncil.com.
 - b. When linking to the begambleaware.org website businesses use the begambleaware logo available for download from: www.begambleaware.org/for-professionals/using-begambleaware-logo.
 - c. When linking to the National Gambling Helpline number (0808 8020 133) businesses use the National Gambling Helpline logo available for download from: www.safergamblingstandard.org.uk/helpline-logo.
- 14. The following examples serve as **guidance** for businesses on what **can** constitute 'prominent' display (please note this is not an exhaustive list):
 - a. Positioning Safer Gambling information 'above the fold' in the primary navigation menu (for desktop).
 - b. Positioning Safer Gambling information in the primary or secondary navigation menu (for pad or mobile).
 - c. Positioning Safer Gambling information clearly in the customer's account section, for example, by ensuring that the customer does not need to scroll to access the information.
 - d. Positioning Safer Gambling information on any page where the customer can register an account or deposit funds with, for example, this information being placed near the button where the customer clicks to 'register' or 'deposit'.
 - e. Displaying Safer Gambling information to the customer upon registration, either via a pop-up message built into the website/app or via an email.
 - f. Displaying Safer Gambling information within rotating banners or carousels (if applicable within the website or app design), ensuring the information is displayed within the first three banners on rotation.
 - g. Displaying Safer Gambling information in space which is allocated for promotion or advertising purposes.
 - h. Displaying Safer Gambling information in space which is allocated for the display of gambling products.

See Appendix A for how these examples could be applied in practice.



15. The Code recognises that it cannot be prescriptive on the placement of Safer Gambling information given the differing technical capabilities and designs of websites and apps. Likewise, businesses should be encouraged to trial different approaches to placement, so that a better understanding can be developed in this area.

Safer Gambling messaging

- 16. Where reasonably practicable, Safer Gambling information **should** be accompanied by a Safer Gambling message. It is not within the remit of this Code to prescribe what type of Safer Gambling messaging may be appropriate. However, it should be recognised that no single set of effective messages will always work. Businesses should use this Code in conjunction with some key principles for effective design of messaging.
 - 17. The following list serves as **guidance** for businesses when considering how to deliver a high-quality Safer Gambling message. This guidance is based on the findings from *An Integrated Approach to Safer Gambling*, by Revealing Reality (March 2021), available at: www.revealingreality.co.uk:
 - a. Ensure Safer Gambling messaging changes over time to avoid customers becoming desensitised to the message.
 - b. Ensure consistency in Safer Gambling messaging.
 - c. Integrate Safer Gambling messaging within the normal customer experience.
 - d. Ensure that Safer Gambling is presented as central to the business's brand.
 - e. Ensure that the tone of messaging normalises Safer Gambling for customers.
 - f. Ensure that Safer Gambling messaging speaks to how and why customers can stay in control.

Access to Safer Gambling tools or controls

- 18. Businesses **shall** ensure that Safer Gambling tools are sufficiently integrated within the online customer journey and that there is **minimal friction** for customers, irrespective of risk profile, in applying these tools.
 - 19. The following examples serve as **guidance** for businesses on what **can** constitute 'minimal friction' (please note this is not an exhaustive list):
 - a. When logged in, a customer can **access tools** to manage their gambling within two clicks from anywhere on the site.
 - b. A customer can **set a tool** to manage their gambling from within any mobile app version of the business's site; they are not redirected to a browser to log in.

See Appendix B for how these examples could be applied in practice.

20. When a customer has not set a Safer Gambling tool on their account, the business shall have a process in place to actively remind the customer of the purpose of those



tools. It is for the business to determine the most effective method and frequency of reminders relevant to their customer base.

- 21. The following examples serve as **guidance** on how a business **can** implement a Safer Gambling tool reminder process (please note this is not an exhaustive list):
 - a. Send an email or pop-up reminder to active customers at set intervals following the customer's account registration. This is without prejudice to the many interventions committed to by businesses based on player risk indicators.
 - b. Ensure the tone and messaging of customer reminders prompt the customer to reflect on their use of tools.
 - c. Ensure customers who have set low limits on their account are not sent reminders, nor encouraged to remove these limits.

Minimum content requirements for Safer Gambling section or microsite

- 22. In the business's Safer Gambling section or microsite, the business **shall** display a statement of their commitment to Safer Gambling and a Safer Gambling message for customers.
- 23. In the business's Safer Gambling section or microsite, the business **shall** display the following minimum information on **tools** with an explanation as to what the value of each would be:
 - a. information on Safer Gambling tools offered by the business such as limit setting, reminders and time outs.
 - b. information on the GAMSTOP self-exclusion scheme and other multi-operator self-exclusion schemes, such as those listed on this page: www.gamcare.org.uk/self-exclusion. GAMSTOP provides separate guidelines to businesses on minimum content requirements.
 - c. information on gambling specific and general blocking software such as Gamban, Gamblock, Betfilter, BetBlocker and/or Net Nanny.
 - d. information on banks that provide gambling blocks to their customers.

 Businesses should use the following brief description for this service: "For a list of financial services organisations in the UK that currently offer gambling blocks on debit cards see: www.gamcare.org.uk/block-gambling-transactions."
 - e. information on how to limit exposure to gambling advertising across social media platforms, such as is explained on this page: www.begambleaware.org/limiting-gambling-ads-online.
 - f. an accepted and simple Safer Gambling self-assessment process to enable the customer to consider their gambling behaviour.



- 24. The following examples serve as **guidance** for businesses on what **can** constitute an 'accepted and simple' self-assessment process (please note this is not an exhaustive list):
 - a. GamTest as shown on the GamCare website: www.gamcare.org.uk/self-assessment-tool.
 - b. Problem Gambling Severity Index (PGSI) as shown on the GambleAware website: www.begambleaware.org/gambling-problems/do-i-have-a-gambling-problem/.

Businesses should be mindful that the Diagnostic and Statistical Manual of Mental Disorders (DSM-5) is a clinical tool that should not be used for self-assessment.

- 25. In the business's Safer Gambling section or microsite, the business **shall** display the following minimum information on **support**:
 - a. reference to the National Gambling Helpline with the following descriptor: "GamCare operate the National Gambling Helpline and offer confidential information, advice and support for anyone harmed by gambling in Great Britain. The Helpline is open 24 hours every day on Freephone 0808 8020 133 or via Live Chat. Advisers will listen to you, they won't judge and your conversation is confidential." Link: www.gamcare.org.uk/talk-to-us-now/.
 - b. reference to GamCare Forums and Chatrooms with the following descriptor: "GamCare offers a moderated online forum and daily online group chatrooms to enable those affected by gambling harms to connect with others in similar situations, share their experience and support one another." Links: www.gamcare.org.uk/gamcare-forum and www.gamcare.org.uk/group-chatroom.
 - c. reference to the begambleaware.org website with the following descriptor: "BeGambleAware provides information, advice and directs people to support to help keep people safe from gambling harms." Link: www.begambleaware.org.
 - d. reference to the National Gambling Treatment Service with the following descriptor: "The National Gambling Treatment Service is a network of organisations working together to provide confidential treatment and support for anyone experiencing gambling-related harms, free to access across England, Scotland and Wales." Link: www.begambleaware.org/ngts.
 - e. reference to the gamblingtherapy.org website with the following descriptor: "Gambling Therapy are a global online support service, offering advice in multiple languages for people who have been adversely affected by gambling." Link: www.gamblingtherapy.org.
- 26. The business **should** consider ways to better integrate their Safer Gambling section or microsite within the customer journey.



Footers

- 27. If the business uses a footer on their site, the following information **shall** be given prominence on every page of this footer:
 - a. A link to the business's Safer Gambling section or microsite.
 - b. A link to the begambleaware.org website.
 - c. The National Gambling Helpline number (0808 8020 133) with a link to www.gamcare.org.uk/talk-to-us-now/.
 - d. A link to the gamblingtherapy.org website.
 - e. A link to www.gamstop.co.uk.
 - f. Industry-wide Safer Gambling message.
 - g. 18+ icon.

Relevant logos should be used to display the information above, in accordance with specified guidelines for usage (see <u>clause 13</u>). An example footer can be found in Appendix C.

28. Businesses who do not use footer designs within their site, such as on mobile apps, **should** consider other ways to incorporate clauses 27 a - g within the pages of their site.

Updating Safer Gambling information

29. Businesses **shall** review the Safer Gambling information provided to customers on their site on at least an annual basis. The aim of the review is twofold (i) to ensure continued accuracy of content and (ii) to take into account new evidence that emerges around effective Safer Gambling messaging.

Presentation of content

- 30. Businesses **shall** present Safer Gambling information to customers in a **concise** and **engaging** way, taking into consideration the most effective methods of communicating such information.
- 31. The following examples serve as **guidance** for businesses on what **can** constitute 'concise and engaging' (please note this is not an exhaustive list):
 - a. Avoid presenting Safer Gambling information in a text heavy way, for example, by breaking down content into bite-sized paragraphs, topic sub-sections and bullet points to make it easier to read.
 - b. Providing a navigation menu for lengthier content, to allow the customer to easily scan and locate the desired section.



- c. Provide concise written descriptions of tools and support options for customers, for example, a description of no more than three sentences in length for each tool or support option.
- d. Use font sizes that draw attention to the content and is comparable to font sizes used in promotional materials.
- e. Where possible or relevant, use visuals, including video, to make the content more appealing, for example, businesses could use this video explaining the GAMSTOP self-exclusion process: https://vimeo.com/369796778 or this video explaining GamCare's support services: https://vimeo.com/415921217.
- 32. Where possible, marketing, communications and user experience (UX) teams at the business **should** input into Safer Gambling information content design.

Self-excluding customers

- 33. When a customer self-excludes from a business, the business:
 - a. shall make the customer aware of the national multi-operator self-exclusion scheme, GAMSTOP. GAMSTOP provides separate guidelines to businesses on minimum content requirements.
 - b. **shall** make the customer aware of other multi-operator self-exclusion schemes, such as those listed on this page: www.gamcare.org.uk/self-exclusion.
 - c. **shall** signpost the customer to the National Gambling Helpline number (0808 8020 133).
 - d. **should** use the following text in email or inbox communications with the customer: "GamCare operate the National Gambling Helpline and offer confidential information, advice and support for anyone harmed by gambling in Great Britain. The Helpline is open 24 hours every day on Freephone 0808 8020 133 or via Live Chat. Advisers will listen to you, they won't judge and your conversation is confidential. Advisers can also provide information about or refer into other important support services, such as debt and financial advice services. For a full range of support and treatment options, visit www.gamcare.org.uk".
 - e. **should** signpost the customer to relevant support organisations.
- 34. Businesses **shall** consider GamCare's Gambling-Related Financial Harm Toolkit and referral pathways guidance for gambling businesses when setting procedures for self-excluding customers: www.gamcare.org.uk/gambling-related-financial-harm/.
- 35. Businesses **should** sign up to GamCare's Helpline Transfer service to facilitate immediate referrals to the National Gambling Helpline for self-excluding customers: www.safergamblingstandard.org.uk/helpline-transfers.



Approach to Code development

- 36. This is the first edition of GamCare's Industry Code for the Display of Safer Gambling Information (Gambling Websites and Apps). An equivalent code for land-based businesses is being developed separately.
- 37. This Code has been developed with the following in mind:
 - a. Alignment with other working groups: This work takes into consideration and aligns closely with other workgroups operating in this field, in particular those dealing with the cross-sector Gambling Related Financial Harm initiative, Game Design Code of Conduct and refreshing the When the Fun Stops Stop campaign to develop a new industry-wide Safer Gambling message.
 - b. Research and evidence base: Decisions made around best practice and the ambitions of this project have been guided by existing research, customer insights and expectations, and GamCare and the BGC have collaborated with experts and those with lived experience.
 - c. Code evolvement: GamCare and the BGC expect this Code to be a living document which evolves and adapts according to changes in regulation, new research and evaluation.

Compliance, evaluation and review

- 38. Complaints and breaches of this Code are dealt with by the BGC. Any possible breaches of the Code should be reported to complaint@bettingandgambingcouncil.com.
- 39. This Code will form part of the Safer Gambling Standard assessment criteria from January 2021 (Standard v3.0 B2C). Businesses who achieve Standard v3.0 B2C or later, will be deemed compliant with the Code at the point of their assessment: www.safergamblingstandard.org.uk/what-is-the-standard.
- 40. For the avoidance of doubt, in this Code:
 - a. All clauses which use the word 'shall' are requirements.
 - b. All clauses which use the word 'should' are recommendations.
 - c. All clauses which refer to 'guidance' are examples of how a business could apply the Code in practice. Guidance clauses are distinguished by shaded boxes within the text.
- 41. Businesses are responsible for evaluating the effect that the Code has had on their approach and the resultant impact on customer behaviour. Key areas for evaluation include but are not limited to:



- a. Impact on customer behaviour of increased prominence and visibility of Safer Gambling information, such as increased traffic to the business's Safer Gambling tools, section or microsite (clauses 11 14).
- Impact on customer behaviour of reducing friction to access tools (<u>clauses 18 19</u>).
- Impact of new reminder processes on customer behaviour and uptake of Safer Gambling tools (<u>clauses 20 - 21</u>).
- d. Impact on customer behaviour of changes to the presentation of Safer Gambling information (clauses 30 31).
- 42. GamCare, in consultation with the BGC, are responsible for conducting periodic reviews of the Code.
- 43. There is emerging evidence¹ to suggest that the terms used in relation to Safer Gambling can have an impact on how customers perceive tools and support and associated stigma. Developments in this area will continue to be monitored.

Glossary of terms

Gambling harms: Adverse consequences arising from someone's gambling behaviour. This could affect the individual, their family, friends, broader social network or community. Some of the most common harms are financial harm, harm to mental health such as anxiety or stress, relationship difficulties or breakdown, isolation and problems with work or housing.

Responsible Gambling: A widely used term for social responsibility initiatives across the gambling industry. Responsible Gambling may tend to focus on actions gamblers can take to be more responsible when gambling or gaming, as opposed to 'safer gambling' tools and support to prevent harms.

Safer Gambling: Taking into consideration the person, product and environment, 'safer' gambling is that which limits the risk of gambling risks and potential and gambling harms. 'Safer gambling' is a more comprehensive description than 'Responsible gambling' as this also gives greater focus to preventative actions.

Safer Gambling tools: These are tools used by gambling businesses to encourage safer play, as well as to help customers control or limit their gambling.

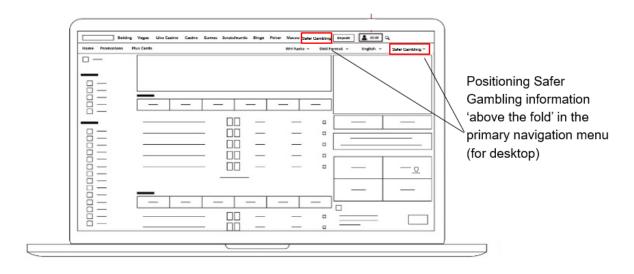
¹ Alex Blaszczynski , Thomas B. Swanton & Sally M. Gainsbury (2020): Avoiding use of stigmatising descriptors in gambling studies, International Gambling Studies, DOI: 10.1080/14459795.2020.1808774



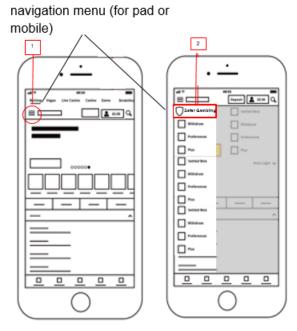
NOTE ON APPENDICES: *The appendices provided on the following pages are examples of how elements of the Code could be implemented in practice. They are not, however, the only options available to achieve the outcome intended.

** A shield icon has been used in these appendices as a placeholder for the <u>Safer Gambling</u> icon which is currently being developed by the BGC.

Appendix A: Placement of Safer Gambling information within website or app examples







Positioning Safer Gambling information in the secondary

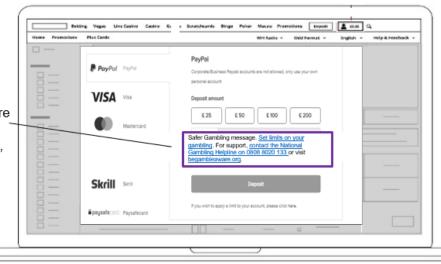


Appendix A: Continued



Positioning Safer Gambling information clearly in the customer's account section, for example, by ensuring that the customer does not scroll to access the information.

Positioning Safer Gambling information on any page where the customer can register an account or deposit funds with, for example, this information being placed near the button where the customer clicks to 'register' or 'deposit'



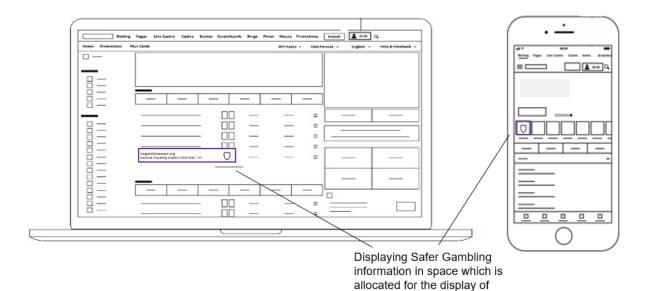
Displaying Safer Gambling information within rotating banners or carousels (if applicable within the website or app design), ensuring the information is displayed within the first three banners on rotation.





Appendix A: Continued





Appendix B: Access to Safer Gambling tools or controls example

gambling products.





Appendix C: Footer example



If the operator uses a footer on their site, the following information shall be given prominence on every page of this footer