

Discussion Paper on Responsible Gaming Standards , Prague, Friday 10 October 2014

Introduction

In a lot of different countries and on a great number of different levels a discussion is going on Responsible Gaming.

In general the discussion takes place on a voluntary basis and as a pro=active activity especially on behalf of the gaming industry to avoid that a lot of matters have to be arranged on a country or on a supra-national level. You can find examples of these in the standards that are developed by EL / WLA and the ECA, especially when we look at Lotteries and land based casino operators. Also the Slot machine industry (Euromat) and the online industry have developed their own standards (RGA ,eCogra and CEN norms) via the EGBA.

Besides the above other independent organisation (sometimes with a treatment / counselling background, like the RG check of the RGC Ontario, Canada, the GamCare certificate from the UK and the international G4 (Global Gambling Guidance Group) have developed their own Codes of Practices/ Code of Conduct and RG checklists, in general for as well as the land based as the online market.

Also for the independent testing agencies ,like GLI, BMM and Nmi the responsible gaming market is an interesting phenomena. It look like that , in cooperation with the industry, models are being developed in which the hardware (technical parts) and the software (responsible gaming) topics are combined.

In the light of this discussion paper the above mentioned responsible gaming standards together with a number of other standards can be considered on two levels.

1. Codes of Practice / codes of Conduct
2. Audit checklists

The aim of the above is:

1. To understand the diversity of as well as the Codes and the Audit checkpoints
2. To review in a critical way the content
3. To comment to the above and eventually add additional points.

On the basis of the above a standard needs to be developed that take into account the present law and the role of the gambling commission / gaming authority. It should also look at the different roles that are important in the process.

Codes of Practice / codes of Conduct

In the Codes that have been considered and checked in all cased the following key points come back. The Code is a manual , a guide and should always be part of the existing law and regulations in the country were the operator of the product is doing business.

1. The operator makes clear what the aim is as well as the role in preventing and minimising the negative aspects of problematic play and in what way to deal with a responsible gaming policy

2. The operator has a license in the country that he is offering his products and is, together with others, responsible for the highest standard for a fair offer. It must be possible for the player and others to view the rules and regulations according to the license. This should be made possible via the website of the operator and / or via the website of the regulator.
3. The operator has a control system on all technical aspects and is licensed by the regulator or an accredited testing agency.
4. The operator should at all times give the regulator and if applicable the testing agency give the possibility to test the systems used and the procedures. To evaluate and carry audits by inspecting the files, making checks and testing the software used and all other aspects that are important to be able to carry out an audit. These audits take place as a minimum on an annual basis.
5. The operator, under no circumstances will let the player play on credit.
6. The operator takes all measures to be able to identify all transactions with special attention to those that can possibly have to do with money laundering and / or terroristic activities.
7. The operator informs the player on all aspects that are important and related to possible tax measures related to the winning of prizes.
8. The operator controls and guarantees the privacy of the player using a safe and secure data base and taking into account all regulations that are dealing with privacy issues. As a standard the information on the player is kept for a period of 5 years.
9. The operator screens every new game on possible indications that could lead to problematic behaviour using a risk monitor.

Operational content of the Code of Practice.

A number of examples / topics

1. Check of age. The operator takes all measures to identify and check the age of new players.
2. The site or venue shows a sign that underage play is not permitted.
3. The operator makes clear that underage play should also not take place under the supervisions of parents or other adults.
4. Check on age and identity is absolutely critical during the registration process.
5. Besides the age check also payment methods that cannot be trusted and / or can be used by minors as well, should not be accepted as a method of payment.
6. When it is about player protection and social responsibility information must be available of the CSR partner of the operator, at least on the homepage a link should be available to the responsible gaming page of the operator.
7. The responsible gaming page should at least give information on: advise on responsible play, a warning that gambling can lead to problems / addiction and a link to a self-test, links to a filter or block programme so that minor cannot play, details on the operators responsible gaming programme and all other possible measures.
8. When online the account page refers and have a direct link to the responsible gaming page.
9. The information of the operator may not be misleading.
10. Advertising ,marketing and promotional materials have to be according what is allowed according to the law, the applicable standards and good taste. Commercials should not focus on minors and balanced and informative. Players should not be encouraged to re-invest their winnings.
11. It is the responsibility of the operator to train his employees. Special attention, special training for those who are in contact with the players. Training needs to be refreshed on an on-going basis.
12. When games for fun, no money games, are being offered the odds have to be the same as for the real money games. Same pay-out percentages, same age restrictions and a reference to a CSR and responsible gaming page.

13. The player should (when play online) register preferably one credit card and / or debit card. The maximum limit is 3 credit cards. Player uses only one and not multiple accounts on the same physical address with different user names / log in codes.
14. Reality checks. The player must have the possibility to check wins and losses on a regular basis so that he can make choices to keep on playing or not. A clock can be helpful in this ,but is not mandatory.
15. The player should be able to set limits in time , money ,per game , per session. When a player does not set limits himself it is to be considered if maximum in time and money should be made mandatory. After this the player is being informed. It is impossible to automatically keep on playing and start a new game.
16. Self –exclusion possibilities , minimum of 6 months , Proactive approach on behalf of the operator, don't wait until the problems are too big. Self-exclusion can also be for a longer or indefinite period of time.
17. Offer of other measures like : cooling off period (minimum) 24hours – maximum 7 days).
18. Besides the above it is advised to inform the player on a regular basis on his actual playing behaviour. Instruments have been developed that can help (Examples : Playscan , Mentor).
19. Besides session and budget limits, it should also be possible to offer loss limits per day, week, month and year.
20. When the operator signals possible problem gambling behaviour he has to inform the player on this via email, telephone, chat room and other communication methods. Special training employees are being used for this.

Audit checkpoints

Without going into details and the different possibilities, here you'll find a short summary of what can be expected in general from the operator to inform the auditor as well about when the audit (on the average one or max. two days) is being carried out.

1. Responsible gaming commitment. It means that the operator has a clear and transparent way of how to deal with gambling related problems and problem gamblers. Responsible gaming programmes are part of the daily operations and the management supports and communicates actively on the topic of responsible gaming
2. The players account. Checks on the availability of the information and the efficiency of the control systems
3. Minors are not permitted to play. Check on the effectiveness of the control system and what to do in case.
4. Reality checks. Clock, what are minimum and maximum amounts of money regarding budget, spending and loss limits. Is there a maximum per certain period.
5. Responsible gaming page. All necessary and preferred information is supposed to be available. Verantwoord spelen pagina. Who is the CSR and RG partner. Which tests are being used. What is been done with the results. Who the referral partner. What happens with all the information that is being collected. What is been done with the player profiles.
6. Self-exclusions and cooling off. What options are being used and how often. What does that means compared to the total of active players. When players are excluded, confirmations are sent, is it possible to get back before the time limit has ended. Removal from mailing lists and other promotional materials. What happens when someone has a request to come back and play again.
7. Does the operator actively promote in a pro-active way to use limits. Is this offered in an easy way. How easy is it to extend temporarily self-exclusions. What is being used as limits. Deposit , loss limits, or... Decrease of limit with immediate effect. Increase , waiting time 24 hours – 7 days.

8. Account page, easy link, entrance. Account history , wins and losses, different games, separated and all together. Live update when pay out or a waiting period. Is the page easy accessible and user friendly.
9. Education / training. Experienced trainers, accredited and by whom. Content of the training ,all staff, special sessions for customer support, marketing and management. Refresher courses. Proof: keep register. Content of the training . Offline (FTF) vs. Online.
10. Specific policies What to do with complaints, information from 3rd parties. What when a minor is being discovered. What to do when a players tells he has a problem. When a player is excluded, is there aftercare. What to do if an employee has a problem himself.
11. The basis of the audit and the Responsible Gaming programme of the operator is the so-called Policy Procedures Manual (PPM). This PPM is available for all employees and is being updated on a regular basis, with a minimum of once a year. The employees are being informed on the changes and new parts on a regular basis.

Finally

The most important part of the policy is that the player is able to make an informed decision that is based on an informed choice. When necessary and applicable help and support is given according to a stepped care model. The aim is to give general information on games of chance and the problems that can occur. Specific information for the player and the information on help services should preferably be given in a way of personalised feedback.

30 September 2014/pr