



# Safer Gambling Standard

*For Business to Consumer Gambling Operators*

*Version 2.1 (2020)*

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## 1. Introduction

The Safer Gambling Standard accreditation scheme recognises gambling operators who are meeting and going beyond the requirements of gambling industry Codes of Practice in respect of their player protection measures. The scheme is managed by GamCare, the leading provider of information, advice, support and free counselling for the prevention and treatment of problem gambling.

The Safer Gambling Standard accreditation is renewable on a biennial basis.

### Aims of the Scheme

The Safer Gambling Standard aims to codify the highest standards of social responsibility in the gambling field and to consistently develop those standards in an informed and structured manner so as to drive up the overall standards of social responsibility in the sector and **make gambling safer for everyone**.

The aim is to achieve a 'level playing field' so that all operators are using similar levels of their resources to ensure that the highest standards in safer gambling are met.

### Five Reasons to Apply for the Standard

1. Allows customers and the gambling industry to identify operators who have adopted high standards in safer gambling.
2. Operators can see how they compare to others in the area of safer gambling.
3. Operators receive expert, independent advice throughout the process and a detailed assessment report upon completion.
4. The Standard is reviewed on an annual basis to ensure it continues to promote good practice and build upon safer gambling-related developments in gambling regulation.
5. Fees paid towards accreditation go back into supporting those affected by problem gambling.

### Publishing the Accreditation Status of Gambling Operators

- The names of accredited gambling operators and the level of the award they have achieved can be found at: [www.safergamblingstandard.org.uk](http://www.safergamblingstandard.org.uk).
- Accredited operators can use the Safer Gambling Standard logo to demonstrate their commitment to social responsibility and safer gambling.

## 2. Scope

This Standard sets out requirements for business-to-consumer gambling operators in order to establish, implement and maintain policies and processes that support safer gambling. Operators are required to meet 10 areas which are the foundation to building a safer gambling approach, and include **physical, technical and cultural measures** alongside **effective leadership and governance**.

## The Ten Areas of the Safer Gambling Standard

1. Corporate governance and risk management
2. Collaboration and sharing best practice
3. Operator spend on safer gambling including the most recent percentage annual Gross Gambling Yield (GGY) contribution to organisation(s) that undertake research, education and treatment (RET) on the subject of gambling-related harm
4. Protection of children, young adults, and vulnerable customers
5. Customer information, profiling and interaction
6. Product design and innovation in safer gambling tools, and the deployment of products in environments which minimise the risk of customers experiencing gambling-related harm
7. Self-exclusion
8. Advertising and promotion
9. Staff training and development
10. Addressing problem gambling amongst staff

Within each area of the Standard operators need to meet several criteria (see **ANNEX 1**).

Operators can achieve four levels: Base, Advanced Level 1, Advanced Level 2 or Advanced Level 3 (see **Section 4**). These levels are related and designed to build on each other, meaning that in order to achieve an Advanced Level it is inclusive of the requirements at the Base Level.

## 3. Eligibility

Gambling operators across all sectors can achieve the Safer Gambling Standard – betting, gaming, bingo, casinos and lotteries.

To apply to the scheme a gambling operator must:

- be licensed by the UK Gambling Commission;
- be trading for at least 6 months; and
- provide gambling services and products to individual customers (consumers).

The assessment can look at either an operator's land-based business operations, online business operations, or both (where operators have and wish to be assessed against both).

## 4. Levels of the Safer Gambling Standard

To recognise operators who are leaders in social responsibility and safer gambling, the Standard provides four levels of recognition: Base and Advanced Levels 1, 2 and 3.

- To be awarded the Base Level of the Standard: **All Base Level criteria** must be met as per **ANNEX 1**.
- To be awarded an Advanced Level of the Standard: All Base Level criteria must be met **plus** all mandatory Advanced Level criteria at Items 1.3, 3.2, and 5.11 of the Safer Gambling Standard **plus** any other Advanced Level criteria as per **ANNEX 1**. Item 1.3 is also required to meet Base Level criteria but attracts additional marks at Advanced Level depending on the degree to which the effectiveness of assurance processes can be demonstrated.

Operators who meet Advanced Level criteria (mandatory and other) have their percentages totalled to determine the level awarded as indicated in **TABLE 1**. Percentages allocated to Advanced Levels of the Standard can be found against each Advanced Level Item at **ANNEX 1** and in **ANNEX 2**.

**TABLE 1: LEVELS OF ACCREDITATION**

Level	Description	Examples of what this looks like
<b>Advanced Level 3</b> <i>Met 61-100% of Advanced Level criteria</i>	Operator has adopted a wide range of robust safer gambling measures that go beyond the social responsibility provisions of its gambling licence.	Operator contributes at least 1% of its annual Gross Gambling Yield (GGY) to safer gambling (including internal spend), and has well-developed safer gambling assurance processes in place, such as recording, testing and continuing to improve customer risk profiling and approaches to proactive and reactive customer interaction.
<b>Advanced Level 2</b> <i>Met 31-60% of Advanced Level criteria</i>	Operator is developing or has adopted a range of safer gambling measures that go beyond the social responsibility provisions of its gambling licence.	Operator contributes at least 0.5% of its annual GGY to safer gambling (including internal spend), has safer gambling assurance processes in place, and many areas of good practice are followed, such as customising training for specific groups of staff.
<b>Advanced Level 1</b> <i>Met up to 30% of Advanced Level criteria</i>	Operator is developing or has adopted some safer gambling measures that go beyond the social responsibility provisions of its gambling licence.	Operator contributes at least 0.2% of its annual GGY to organisations involved in the prevention, research or treatment of gambling-related harm.
<b>Base Level</b>	Operator meets the social responsibility provisions of its gambling licence.	Operator contributes at least 0.1% of its annual GGY to organisations involved in the prevention, research or treatment of gambling-related harm.

## 5. Accreditation process

### 5a. Overview

The Safer Gambling Standard assessment involves:

- a review of a gambling operator’s policies, procedures, systems, controls, and approaches to customer interaction;
- visit to the operator’s head office location(s);
- interviews with the operator’s staff; and
- website reviews (for online operators) and premises visits (for land-based operators).

The assessment examines a range of areas to get a true sense of an operator’s organisational culture. For safer gambling measures to be effective it is essential that they are integrated into organisational culture and flow throughout the organisation.

GamCare works with operators to agree the format of the assessment. The assessment focuses on a review of evidence relating to the operator’s approach to minimising gambling-related harm.

### 5b. Timeline

It takes approximately 6 months for an operator to achieve accreditation from initial enquiry to the award of the Standard. **TABLE 2** outlines the process from start to finish.

**TABLE 2: THE STAGES OF SAFER GAMBLING STANDARD ACCREDITATION**

Stage	Task	Month
<b>Stage 1: Scoping and contract</b>	Operator submits enquiry about accreditation.	1
	Assessor and operator meet to agree scope e.g. size and nature of operations, whether land-based and/or online assessment. Agree dates for head office visit(s) and any premises site visit(s) if required.	1
	Operator submits information on its organisational structure and current approach to safer gambling.	1
	Assessor provides operator with contract proposal and Self-Assessment Questionnaire.	1
<b>Stage 2: Operator submits evidence</b>	Operator submits Self-Assessment Questionnaire and any accompanying documentary evidence (see section 5c).	2 - 3
	Assessor confirms agenda for head office visit(s) and any premises site visit(s).	2 - 3

<b>Stage 3: Website review (online operators only)</b>	Operator provides test account information for website review.	2
	Assessor reviews website(s) for compliance with relevant areas of the Standard.	2 - 3
<b>Stage 4: Head office and premises visit(s)</b>	Assessor meets with following teams; senior management, compliance, operations including VIP, marketing, customer services, HR/training.	3
	Assessor reviews systems; customer interactions, marketing and affiliate controls, complaints.	3
	Assessor undertakes premises site visit(s) (land-based operators only).	3
	Assessor has final meeting with senior management to discuss findings.	3
<b>Stage 5: Assessment Report sent to operator</b>	Operator can submit any final/outstanding evidence for assessor's consideration.	4
	Assessor drafts report which is signed off by GamCare senior management.	4 - 5
	Report sent to operator confirming provisional level of accreditation.	5
<b>Stage 6: Operator responds to Assessment Report</b>	Operator has 4 weeks to respond to the draft Assessment Report (see section 5d). Response to include any final evidence required which remains outstanding in order for the Standard to be awarded.	6
<b>ACCREDITATION IS AWARDED</b>		
<b>Assessment review</b>	If the operator has not yet achieved Advanced Level 3 and wishes to do so, the operator can apply for an assessment review (see section 5e). Assessment reviews can be carried out from 3 months after the award of the Safer Gambling Standard Certificate. Further assessment reviews can be carried out on a quarterly basis thereafter up to 12 months after the award of the Certificate.	9, 12
<b>Re-accreditation</b>	Operator commences application for re-accreditation 6 months before current accreditation expires.	18 - 24

### **5c. Self-assessment questionnaire and evidence submission**

As part of the Safer Gambling Standard assessment, operators complete a Self-Assessment Questionnaire and electronically submit accompanying written evidence in advance of any on-site assessment work.

For those operators required to file an Assurance Statement with the UK Gambling Commission on an annual basis, the Safer Gambling Standard assessment includes a review of the systems and controls shown in the latest Assurance Statement.

### **5d. Assessment report**

Upon completion of the Safer Gambling Standard assessment, the assessor issues an Assessment Report to the operator which sets out which level of the Standard the operator has met on the proviso that a satisfactory response is received to the report. The Report consists of two sections:

- **Summary of Requirements** – outlines any actions which the operator must take prior to the relevant level of the Standard being awarded.
- **Summary of Recommendations** – provides recommendations on how to achieve a higher level of the Standard and meet additional areas of good practice in minimising gambling harm.

### **5e. Assessment reviews**

Following the review of any further information provided by the operator in response to the Assessment Report, GamCare will award the Standard at the appropriate level.

If the operator chooses to provide further evidence to meet Advanced Level requirements or increase its Advanced Level award from Level 1 or Level 2 to Level 3 from the date of the first assessment decision, the operator can agree to assessment reviews. These reviews can take place on a quarterly basis up to 12 months after the date of the initial award. The operator can choose to have one or more reviews up to 12 months after the assessment award but there must be at least three months between each review.

### **5f. Responsibilities during accreditation period**

Safer Gambling accreditation is a measure of the effectiveness of an operator's approach to social responsibility at a specific point in time.

Accreditation lasts for a period of 2 years. As the Safer Gambling Standard is updated annually, operators are expected to keep up to date with the evolving requirements of the Standard, i.e. by reviewing and ensuring compliance with any revised version of the Standard prior to re-accreditation.

From the point of accreditation an operator must advise GamCare of significant changes to its approach to social responsibility as measured in each of the 10 areas of the Safer Gambling Standard shown at **ANNEX 1**.

The operator must also advise GamCare of the results of any regulatory action by a regulator, (such as a Regulatory Settlement), which potentially casts doubt on the effectiveness of the operator's approach to safer gambling which occurred during and since the period of GamCare's Safer Gambling Standard assessment. GamCare will work with the operator to ensure that any weaknesses are remedied, but GamCare reserves the right in

exceptional circumstances to revoke certification if any weaknesses are not remedied within a reasonable timeframe which is acceptable to GamCare to ensure that the integrity of the Standard is preserved.

## 6. Safer Gambling Standard Review Panel

The Safer Gambling Standard has been developed out of a combination of academic evidence in safer gambling practices, service user input, and GamCare's knowledge and experience from over 20 years of work with those affected by problem gambling, and the gambling industry itself.

An expert panel reviews the provisions of the Safer Gambling Standard on an annual basis to incorporate any changes in regulatory requirements and good practice guidelines, the opinions of GamCare service users, and new insights from academic research. The panel consists of:

- a member of the GamCare Board of Trustees;
- a member of the GamCare Senior Management Team;
- a GamCare service user;
- an academic with experience of working in the field of minimising gambling-related harm; and
- an impartial industry consultant.

## 7. Gambling operators not licensed by the UK Gambling Commission

The primary focus of the Safer Gambling Standard is on gambling operators licensed by the UK Gambling Commission. GamCare will work constructively with gambling operators licensed in other jurisdictions who wish to be assessed against the Safer Gambling Standard, and other organisations who have or may develop independent standards to prevent gambling-related harm in other jurisdictions around the world. Operators who are not eligible for the Standard may be interested in accessing GamCare's other industry training products and services at:

[www.safergamblingstandard.org.uk](http://www.safergamblingstandard.org.uk).

## 8. Terms and definitions

For the purposes of the Safer Gambling Standard the following terms and definitions apply.

**Assessor:** A GamCare staff member who is specially trained to assess gambling operators against the Safer Gambling Standard.

**Assurance Statement:** A document completed by the largest gambling operators licensed by the UK Gambling Commission to show how they are performing against the licensing objectives regulated by the Commission.

**At risk gamblers:** People who are at higher risk of experiencing negative effects due to their gambling behaviour.

**Customer:** Person or organisation that could or does receive a product or a service that is intended for or required by this person or organisation.<sup>1</sup>

**Customer identification and interaction:** How an operator identifies individuals who may be experiencing, or at risk of developing, problems with their gambling, and how they interact with them to offer help or support.<sup>2</sup> Customer interactions are sometimes also referred to as proactive and reactive interactions:

- A proactive customer interaction is an operator-led interaction with a customer based on concerns the operator may have based on the customer's gameplay.
- A reactive interaction is the operator's response to being contacted by a customer.

**Gambling operator:** An organisation which provides gambling products or services to a customer. A gambling operator may be a group or a company within a group. To ensure that the Safer Gambling Standard is accessible to the wider public, a gambling operator may also be referred to as a 'gambling business' or 'gambling company'.

**Gambling-related harm:** Adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society.<sup>3</sup>

**Gross Gambling Yield (GGY):** Profit generated by a gambling operator within a specified time period. This is broadly calculated as the amount staked by customers, plus any other amounts accrued by the operator in relation to the gambling products and services they offer, minus the amount of any winnings or prizes paid out by the operator during that period.<sup>4</sup>

**Land-based gambling operator:** An operator who offers gambling products or services to a customer in a physical location.

**Loyalty or bonus scheme:** A scheme set up by a gambling operator which involves some sort of discount, offer or benefit to a customer.

**Online gambling operator:** An operator who offers gambling products or services to a customer online. These operators are also referred to as 'remote gambling operators'.

**Policy:** Overall intention and direction of an organisation formally expressed in writing.

**Problem gambling:** 'Problem Gambling' is gambling which compromises, disrupts or damages family, employment, personal or recreational pursuits. This typically manifests over a spectrum from moderate to severe.

**Procedure:** Authorised specified way to carry out an activity or process for an organisation as set out in writing.

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<sup>1</sup> SOURCE: BS EN ISO 9000:2015, 3.2.4

<sup>2</sup> SOURCE: Gambling Commission. Further information on customer interactions is available from: <https://www.gamblingcommission.gov.uk/PDF/Customer-Interaction-Formal-Guidance-Remote-July-2019.pdf> and <https://www.gamblingcommission.gov.uk/PDF/Customer-Interaction-Formal-Guidance-Non-Remote-July-2019.pdf>.

<sup>3</sup> SOURCE: Gambling Strategy Commission, National Strategy to Reduce Gambling Harm 2018

<sup>4</sup> SOURCE: Gambling Commission, Further information on how to calculate Gross Gambling Yield is available from: <https://www.gamblingcommission.gov.uk/for-gambling-businesses/Apply-for-a-licence/How-to-calculate-your-gross-gambling-yield-GGY.aspx>

**Safer gambling:** The gambling industry's approach to protecting players from the adverse consequences of gambling. Also commonly referred to in the gambling industry as responsible gambling or social responsibility.

**Self-exclusion:** Facility for those that have decided that they wish to stop gambling for at least six months and wish to be supported in their decision.<sup>5</sup>

**Social responsibility:** An ethical framework for businesses but also used specifically in the gambling sector as an alternative to safer gambling.<sup>6</sup>

**Young adult:** Any customer in the age group of between 18 and 21 years (or 16 and 21 years for lotteries where those between 16 and 18 years are permitted to play lotteries).

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<sup>5</sup> SOURCE: Gambling Commission. Further information on self-exclusion is available from: [www.gamblingcommission.gov.uk/for-the-public/Safer-gambling/Self-exclusion.aspx](http://www.gamblingcommission.gov.uk/for-the-public/Safer-gambling/Self-exclusion.aspx)

<sup>6</sup> SOURCE: Gambling Commission. Further information on Social Responsibility is available from: <https://www.gamblingcommission.gov.uk/for-gambling-businesses/Compliance/General-compliance/Social-responsibility/Social-responsibility.aspx>

## ANNEX 1 The Safer Gambling Standard

### 1 Corporate governance and risk management

To ensure the operator embeds a culture of safer gambling within its organisation and for customers through establishing effective policies and processes that are supported at the Board/Executive team level.

Item		Required for Base Level	Required for Advanced Level
1.1	<p>The operator's Board and Executive team shall demonstrate leadership in the area of safer gambling, be responsible for setting safer gambling Key Performance Indicators (KPIs) and ensure that all messages explaining the operator's approach to safer gambling are understood and acted upon by all areas of the business.</p> <p><i>Note: Examples of safer gambling KPIs could include, but are not limited to:</i></p> <ul style="list-style-type: none"> <li>• <i>number of incidents;</i></li> <li>• <i>number of self-exclusion breaches;</i></li> <li>• <i>number of customers designated as 'high risk' based on their gameplay activity; and</i></li> <li>• <i>customer take-up and impact analyses of safer gambling tools.</i></li> </ul>	✓	✓
1.2	<p>The operator shall appoint a member of the Board with overall accountability for the organisation's approach to safer gambling and the achievement of safer gambling KPIs.</p> <p><i>Note: This role differs from the role mentioned at Item 5.2 of the Safer Gambling Standard in that it encompasses the overall accountability for an operator's approach to safer gambling. The accountable person should be a member of the operator's Board, or Group Board for an entity with a group structure. It would also be good practice for a company with Non-Executive Directors (NEDs) to have at least one NED who is accountable to constructively challenge the members of the Executive Team with accountability and responsibility for the operator's approach to safer gambling.</i></p>	✓	✓
1.3	<p>The operator shall implement and maintain effective assurance processes to monitor its approach to safer gambling. It shall also provide evidence that improvements in such processes are monitored, reviewed and evaluated at least annually. (30%)</p>	✓	✓*

1.4	<p>The operator shall establish and maintain effective staff appraisal systems that support the achievement of its safer gambling KPIs. Staff performance shall be evaluated against the achievement of objectives to minimise gambling-related harm and documented in each staff member's annual appraisals/performance reviews. (5%)</p> <p><i>Note: For example, compliance KPIs related to minimising gambling-related harm are documented within employment objectives and/or contracts of employment.</i></p>		✓
1.5	<p><b>(LAND-BASED)</b> The operator shall make available its premises local area risk assessments in the premises to which they relate. The assessments shall be reviewed periodically, as a minimum annually, and updated where necessary.</p>	✓	✓
1.6	<p><b>(LAND-BASED)</b> The operator shall update its premises local area risk assessments when there are changes in the risk profile of each premises/local authority area. Such assessments shall include evidence to show that locally available knowledge which reflects local risks has been considered. (15%)</p>		✓
1.7	<p><b>(ON-LINE)</b> The operator shall not allow customers to gamble using credit cards. This requirement comes into force on 14 April 2020. Where credit cards are not prohibited by regulatory requirements prior to this date the operator shall evidence the controls which they have in place to mitigate the risk of customers gambling with money they do not have.</p> <p><i>Note: Where regulatory requirements permit the use of credit cards for gambling prior to 14 April 2020 the customer shall be given the option to remove credit cards from their account, and/or the operator shall state why the removal of all credit cards is in the best interests of customers to ensure that customers cannot gamble with funds they do not have.</i></p>	✓	✓
<p><i>Note: Any requirement that is referenced with an * is a mandatory requirement that an operator is required to meet in order to qualify to receive an award of the Safer Gambling Standard at an Advanced Level.</i></p>			

## 2 Collaboration and sharing best practice

The operator supports and promotes activities and good practices that work towards the eradication of gambling-related harm.

Item		Required for Base Level	Required for Advanced Level
2.1	The operator's approach to safer gambling shall include collaboration with competitors and other organisations on the subject of preventing gambling-related harm.	✓	✓
2.2	<p>The operator shall be able to show the results of outcomes (including successes and failures) in respect of measures tested/implemented aimed at minimising gambling-related harm. (5%)</p> <p><i>Note: Results would commonly be shared with organisations with an interest in minimising gambling harm such as with other gambling operators, trade associations, and regulators.</i></p>		✓

### 3 Operator spend on safer gambling including the most recent percentage annual Gross Gambling Yield (GGY) contribution to organisation(s) that undertake research, education and treatment (RET) on the subject of gambling-related harm

The operator provides an annual financial contribution to relevant organisations and/or charities supporting at risk and problem gamblers or through developing a safer gambling experience for their own customers, such as through the use of safer gambling tools.

Item		Required for Base Level	Required for Advanced Level
3.1	<p>The operator shall make an annual external spend contribution of at least 0.1% of Gross Gambling Yield (GGY) to organisations that undertake safer-gambling-related research, education and training (commonly known as the RET Contribution).</p> <p><i>Note: Contributions required by a regulator as a result of regulatory action, such as regulatory settlement agreements, cannot be included in this calculation.</i></p>	✓	✓
3.2	<p>The operator shall evidence a minimum total annual external spend contribution of 0.2% of GGY in respect of research, education and treatment for the prevention of gambling harm. The level of annual contribution made will have a direct impact on the level of the Safer Gambling Standard award that can be achieved as follows:</p> <ul style="list-style-type: none"> <li>• An operator shall make a total annual contribution of at least 0.2% of GGY to meet the requirements of Advanced Level 1</li> <li>• An operator shall make a total annual contribution of at least 0.5% of GGY to meet the requirements for Advanced Level 2</li> <li>• An operator shall make a total annual contribution of at least 1% of GGY to meet the requirements of Advanced Level 3.</li> </ul> <p><i>Note 1: GamCare accepts evidence of up to 50% of each of the percentages quoted above for Advanced Level 2 and 3 as internal spend where the operator can evidence that such spend has contributed to its own approach in preventing gambling harm amongst its customer base.</i></p>		✓*

	<i>Note 2: Contributions required by a regulator as a result of regulatory action, such as regulatory settlement agreements, cannot be included in this calculation.</i>		
<i>Note: Any requirement that is referenced with an * is a mandatory requirement that an operator is required to meet in order to qualify to receive an award of the Safer Gambling Standard at an Advanced Level.</i>			

## 4 Protection of children, young adults, and vulnerable customers

### 4(a) Protection of children and young adults

The operator has a proactive approach to ensure customers are of a legal age to gamble and has effective measures in place to protect \*young adults from gambling-related harm. Note: \*Young adults are in the age group of between 18 and 21 years (or 16 and 21 years for lotteries where those between 16 and 18 years are permitted to play lotteries).

Item		Required for Base Level	Required for Advanced Level
4.1	The operator shall publicly display information regarding the legal age to gamble to all customers.	✓	✓
4.2	The operator shall implement and maintain a policy and procedure to prevent underage gambling which is evaluated for impact and reviewed as a minimum on an annual basis.	✓	✓
4.3	The operator shall implement and maintain a policy and procedure to verify a customer's age.	✓	✓
4.4	If a customer is identified as underage the operator shall refund the original stake money and log an incident report.	✓	✓
4.5	The operator shall verify the age of each customer in order to play free-play games.	✓	✓
4.6	<b>(ONLINE)</b> The operator shall display links to recognised content filtering software.	✓	✓
4.7	<b>(ONLINE)</b> The operator shall verify each customer's identity and age upon registration.	✓	✓
4.8	<p>The operator shall apply risk indicators at lower levels for customers between the ages of 18 and 21 (16 and 21 for lotteries) and demonstrate how such indicators are used in minimising gambling-related harm to this age group. (8%)</p> <p><i>Note 1: Examples of applying risk indicators at lower levels for online operators might include:</i></p> <ul style="list-style-type: none"> <li>• <i>limiting the number of push marketing messages; and</i></li> </ul>		✓

	<ul style="list-style-type: none"> <li>obtaining source of wealth information at an earlier stage where customer spend patterns identify an increased level of risk.</li> </ul> <p>Note 2: For land-based operators:</p> <ul style="list-style-type: none"> <li>adding an additional indicator for front-line staff to monitor a customer's behaviour and interact with the customer at an earlier stage where gambling is at levels that the customer may be less likely to afford.</li> </ul> <p>Note 3: For all operators:</p> <ul style="list-style-type: none"> <li>offering lower time and/or spend limits as standard; and</li> <li>ensuring staff are trained to deliver appropriate interactions at an earlier stage with customers in this age group.</li> </ul>		
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#### 4(b) Protection of vulnerable customers

The operator has effective systems and controls in place to identify and interact with customers showing signs of vulnerability. Customer Interaction Guidance for Remote and Non-Remote Operators issued by the Gambling Commission in July 2019 are examples of documents which include information on factors which can indicate customer vulnerability. Operators usually identify such customers as 'high risk' based on behaviours, with such behaviours being identified by monitoring patterns of customer gameplay in land-based and online environments.

4.9	<p>The operator shall demonstrate action taken in minimising gambling harm amongst customers exhibiting behaviours that may indicate that they are vulnerable. Such action would include but not be limited to:</p> <ul style="list-style-type: none"> <li>providing information on how to identify and interact with vulnerable customers within safer gambling policies and training;</li> <li>ensuring that systems and controls support measures in place to identify and interact with customers showing signs that they may be vulnerable, which would include those customers the operator has identified as 'high risk' of experiencing gambling-related harm based on their behaviours.</li> </ul>	✓	✓
4.10	<p>Policies, training and systems and controls in place to identify and interact with vulnerable customers shall be monitored and reviewed at least annually.</p>	✓	✓

## 5 Customer information, profiling and interaction

The operator has a proactive approach and effective processes in place to identify and interact with customers experiencing harm from gambling or those 'at risk' of experiencing harm.

Item		Required for Base Level	Required for Advanced Level
5.1	The operator shall implement and maintain effective policies and procedures to identify their customers who may have a gambling problem. These policies and procedures shall be evaluated for impact and reviewed at least annually.	✓	✓
5.2	<p>The operator shall appoint a dedicated 'social responsibility role' with Board level reporting responsibility to ensure that the issue of minimising gambling-related harm is handled effectively.</p> <p><i>Note: This role differs from the role at Item 1.2 of the Safer Gambling Standard which covers the role with Board level accountability for the operator's approach to safer gambling.</i></p>	✓	✓
5.3	<p>The operator shall display and make customers aware of sources of help and support including as a minimum:</p> <ul style="list-style-type: none"> <li>• a statement of the operator's commitment to safer gambling;</li> <li>• a message that gambling could be harmful if not controlled and kept in moderation;</li> <li>• reference to relevant sources of help and website links for minimising gambling-related harm. This would include the GamCare National Gambling HelpLine number applicable to customers in Great Britain;</li> <li>• advice and information on the availability of safer gambling player protection tools; and</li> <li>• information on an accepted and simple safer gambling self-assessment process to enable the customer to consider their gambling behaviour.</li> </ul>	✓	✓

	<b>(ONLINE)</b> The safer gambling web page shall be free from gambling advertising and promotions.		
5.4	<b>(ONLINE)</b> The safer gambling web page is accessible directly from the homepage of the website ‘above the fold’ on both desktop and mobile. (2%)		✓
5.5	The operator shall have effective systems and controls in place to maintain and log all customer interactions.	✓	✓
5.6	The operator shall establish a policy for acknowledging and responding to any third party notice of a customer experiencing harm from gambling.	✓	✓
5.7	The operator shall tailor safer gambling interactions to each customer based on the customer’s risk profile. Such considerations shall be placed above commercial considerations including when dealing with groups such as the vulnerable, young adults, and high spending/VIP customers.	✓	✓
5.8	<p>The operator shall grant all customers free access to their account history where such data is available, including deposits, wagers and withdrawals.</p> <p><i>Note 1: For online operators this is for time periods of not less than those required by relevant regulations, and as a minimum the Remote Technical Standards (RTS) issued by the UK Gambling Commission.</i></p> <p><i>Note 2: For land-based operators a customer’s account history might be limited or unavailable depending on the type of product purchased. The operator should justify what information is possible to provide and give examples of how and what type of information has been provided.</i></p>	✓	✓
5.9	<p><b>(ONLINE)</b> The operator shall implement and maintain effective systems and controls to risk profile customers to identify customers experiencing harm from gambling and customers at risk of experiencing gambling-related harm including as a minimum, but not limited to:</p> <ul style="list-style-type: none"> <li>• customer registration information;</li> <li>• self-exclusion and time out data;</li> <li>• gameplay data;</li> <li>• payment method and changes in payment method data; and</li> <li>• data on complaints and disputes.</li> </ul>	✓	✓

5.10	<p><b>(LAND-BASED)</b> The operator shall implement and maintain effective systems and controls to risk profile customers to identify customers experiencing harm from gambling and customers at risk of experiencing gambling-related harm depending on the type of gambling products provided. Examples of products include electronic roulette, casino table games, Electronic Bingo Terminals (EBTs), Self Service Betting Terminals (SSBTs) using:</p> <ul style="list-style-type: none"> <li>• machine (gambling product) data and/or implementing effective systems to track play on machines;</li> <li>• self-exclusion data; and</li> <li>• data on complaints and disputes.</li> </ul>	✓	✓
5.11	The operator shall be able to provide an evidence-based estimate of the percentage of its 'at risk' (AR) and 'problem gambler' (PG) customer-base and document the approach taken to calculate the percentage of each. (5%)		✓*
5.12	<p>The operator shall take effective measures to ensure that each customer has only one 'live' account, loyalty card or membership or link multiple accounts (products) to ensure a single view of each customer. (5%)</p> <p><i>Note: It is also possible to link certain customer accounts in land-based environments, for example, monitored customers in retail bookmakers that visit different premises in the same area.</i></p>		✓
5.13	<p><b>(ONLINE)</b> The operator shall not offer a facility for customers to cancel withdrawals.</p> <p><i>Note: Online operators were advised by the UK Gambling Commission on 12 May 2020 to prevent reverse withdrawals (the facility for customers to cancel withdrawals) until further notice as one of several measures introduced to further minimise gambling harms during the Covid 19 pandemic.</i></p>	✓	✓
5.14	<p>The operator shall use the source of customer wealth to determine appropriate levels of spend. (5%)</p> <p><i>Note: For example, where changes of a customer's gambling spend have triggered reviews of their account activity.</i></p>		✓
<p><i>Note: Any requirement that is referenced with an * is a mandatory requirement that an operator is required to meet in order to qualify to receive an award of the Safer Gambling Standard at an Advanced Level.</i></p>			

## 6 Product design and innovation in safer gambling tools, and the deployment of products in environments which minimise the risk of customers experiencing gambling-related harm

The operator ensures that its products and tools provide an accessible form of gambling to its customers within an environment which minimises the risk of customers experiencing gambling-related harm, while identifying opportunities to further protect customers from gambling-related harm in the development of new tools.

Item		Required for Base Level	Required for Advanced Level
6.1	<p>The operator shall implement and maintain effective controls to ensure that safer gambling is at the forefront of new product design including products that are designed internally or provided by external suppliers. This shall include ease of access to safer gambling information.</p> <p>Products shall also be deployed in environments which meet required regulatory requirements, minimise the risk of access from children, and do not promote high-risk behaviour such as incentivising the customer to continue to stake at increasing levels.</p>	✓	✓
6.2	<p><b>(ONLINE)</b> The operator shall offer the customer time and/or spend and/or loss limits as the default option from sign-up where customers need to opt-out if they do not wish to set limits.</p> <p><i>Note: Warning messages offer customers the opportunity for self-appraisal of their gambling behaviour.</i></p>	✓	✓
6.3	<p>The operator shall demonstrate that they have prioritised the protection of the customer where vulnerability has been identified in ensuring that the customer sets time and/or spend and/or loss limits.</p>	✓	✓
6.4	<p><b>(ONLINE)</b> The operator shall record and monitor all requests to alter a customer's previously set limits. (5%)</p>		✓
6.5	<p><b>(ONLINE)</b> The operator shall review and evaluate the impact of current safer gambling tools and the implementation of new safer gambling tools. (3%)</p>		✓
6.6	<p><b>(ONLINE)</b> The operator shall give customers the opportunity to opt-in to use each category of product the operator offers, for example, casino games, in-play betting etc. (3%)</p>		✓
6.7	<p>The operator shall have a process in place for referral of customers displaying a high-level of vulnerability (e.g. threat of self-harm) to relevant sources of support.</p>	✓	✓

## 7 Self-exclusion

The operator actively safeguards customers from experiencing harm from gambling through implementing an effective approach to self-exclusion.

Item		Required for Base Level	Required for Advanced Level
7.1	The operator shall ensure that a customer is able to self-exclude from gambling at any time and for a minimum of 6 months. Information regarding the operator's self-exclusion process shall be visible to the customer.	✓	✓
7.2	The operator shall have joined a multi-operator self-exclusion scheme(s) relevant to its business activities.	✓	✓
7.3	The operator shall communicate advice to the customer to self-exclude from all other betting and gambling activities and signpost the customer to relevant multi-operator self-exclusion schemes and support services (e.g. GamCare support).	✓	✓
7.4	Upon self-exclusion, the operator shall close all customer accounts and memberships, and any outstanding balance should be returned to the customer. The operator shall remove the customer's details from any operator and affiliate marketing lists.	✓	✓
7.5	The operator shall establish and maintain a policy for customer reinstatement, including but not limited to a 24-hour cooling off period and no automatic account or membership reactivation.	✓	✓
7.6	The operator shall demonstrate that customers returning from self-exclusion have been offered an interview to determine whether it is in their best interests to re-commence gambling. (2%)		✓
7.7	The operator shall implement and maintain an effective system to prevent breaches of self-exclusion. Any breach attempts shall be recorded and monitored, and customers who attempt to breach are signposted to problem gambling support agencies such as GamCare.	✓	✓
7.8	The operator shall provide a customer the option to take a 'time out'. All time outs shall be recorded and monitored, and the customer advised of the distinction between time-out and self-exclusion.	✓	✓
7.9	The operator shall review and evaluate for impact its self-exclusion policies and procedures, as a minimum, annually. (2%)		✓

## 8 Advertising and promotion

The operator's approach to advertising and promotion, including social media, loyalty, bonus and free play schemes, align with its approach to minimising gambling harm.

Item		Required for Base Level	Required for Advanced Level
8.1	<p>The operator's advertising and promotions, including advertising content, shall be compliant with the relevant regulatory and advisory codes of practice.</p> <p><i>Note: Examples include the Licensing Conditions and Codes of Practice (LCCP), and Codes issued by the Advertising Standards Authority (ASA) and the Industry Group for Responsible Gambling (ICRG).</i></p>	✓	✓
8.2	<p>The operator shall demonstrate consistently going beyond advertising and promotions regulatory and advisory codes of practice in encouraging moderation, not trivialising risk, not encouraging the illusion of control or play, and not encouraging 'machismo themes'. (2%)</p>		✓
8.3	<p>If affiliates are used the operator shall implement and maintain effective systems and controls for the supervision of affiliates.</p>	✓	✓
8.4	<p>The operator shall require customers to take a positive action to opt-in to direct marketing.</p>	✓	✓
8.5	<p>The operator shall prioritise the protection of customers by no longer marketing to customers from the point that they have been identified as a high-risk of being harmed by gambling.</p> <p><i>Note: This Item commonly impacts online operators but can also apply to land-based operators where the operator holds customer data and sends the customer marketing communications.</i></p>	✓	✓
8.6	<p>The operator shall not coerce or imply that customers are obliged to take part in publicity.</p>	✓	✓
8.7	<p>The operator shall establish and maintain a social media advertising policy that protects customers from gambling-related harm.</p>	✓	✓
8.8	<p>The operator's advertising policies shall be evaluated for impact on customer protection and reviewed at least annually.</p>	✓	✓

8.9	<p>The operator's terms and conditions of any loyalty or bonus scheme shall be compliant with the relevant regulatory and advisory Codes of Practice and shall be accessible to the customer throughout the duration of the campaign or scheme. Additionally, for online operators:</p> <p><b>(ONLINE)</b> The operator's terms and conditions of any loyalty of bonus scheme shall be no more than one click away in online advertising.</p> <p><b>(ONLINE)</b> Any refer a friend scheme shall be routed to the safer gambling page where the legal age to gamble of 18 and over (over 16 for a lottery) is stated.</p>	✓	✓
8.10	<p>The operator shall not imply that participation in a loyalty or bonus scheme increases the customer's chances of winning.</p>	✓	✓
8.11	<p><b>(ONLINE)</b> Operators who develop free-play games shall ensure that they are identical to real play games, including, but not limited to:</p> <ul style="list-style-type: none"> <li>• over 18 messaging;</li> <li>• auto-play functions;</li> <li>• game odds;</li> <li>• pay-out percentages; and</li> <li>• links and information on how to play.</li> </ul>	✓	✓
8.12	<p><b>(ONLINE)</b> In addition to meeting the requirements in Item 8.11, free play games shall be designed to avoid the issue of desensitising and normalising playing at enhanced stakes in real money with gameplay restricted to lower amounts or fictional currency. (2%)</p>		✓

## 9 Staff training and development

The operator ensures the quality, integrity and professionalism of its staff to enforce its safer gambling approach.

Item		Required for Base Level	Required for Advanced Level
9.1	<p>The operator shall train all staff to ensure an awareness and understanding of problem gambling issues as well as available customer protection tools.</p> <p><i>Note: This should be done during induction of new staff members with further training provided as necessary.</i></p>	✓	✓
9.2	<p>The operator shall train members of staff that have contact with customers on how to recognise and interact with customers displaying behaviour that is indicative of problem gambling.</p>	✓	✓
9.3	<p>The operator shall identify staff that require training on how to deal with escalated problem gambling issues that relate to their respective responsibilities. All Personal Management Licence Holders (PMLs) and Personal Functional Licence Holders (PFLs) shall also receive such training.</p>	✓	✓
9.4	<p>The operator shall ensure that the type of training provided to staff in respect of safer gambling issues is relevant to their specific role and responsibilities.</p>	✓	✓
9.5	<p>The operator shall customise its safer gambling training for specific groups of staff. (2%)</p> <p><i>Note: For example, staff in VIP or marketing functions.</i></p>		✓
9.6	<p>The operator's training materials shall be reviewed at least annually and updated as required. The operator shall log training attendance and completion of training shall be evidenced and evaluated. (2%)</p>		✓

## 10 Addressing problem gambling amongst staff

The operator embraces a culture of accountability and support to foster safer gambling amongst its staff.

Item		Required for Base Level	Required for Advanced Level
10.1	<p>The operator shall ensure that information is made available to staff to highlight risks and encourage (and de-stigmatise) seeking help if they are concerned about their own or another staff member's gambling behaviour.</p> <p><i>Note: This information should be made available during staff induction and in other ways after induction such as through periodic safer gambling training.</i></p>	✓	✓
10.2	<p>The operator shall implement and maintain policies and procedures to respond to a staff member that has a self-acknowledged problem with gambling.</p>	✓	✓
10.3	<p>The operator shall review and evaluate its policies and procedures for staff problem gambling to assess their impact and update if appropriate. (2%)</p>		✓

## ANNEX 2 Maximum Percentage Scores for Advanced Level Requirements

The following table shows the maximum percentage scores operators can meet in order to achieve specific Advanced Level requirements in sections 1 to 10 of the Safer Gambling Standard.

Section	Online operator %	Land-based operator %
<b>1 Corporate governance and risk management</b>	<b>35</b>	<b>50</b>
1.3	30	30
1.4	5	5
1.6	-	15
<b>2 Collaboration and sharing best practice</b>	<b>5</b>	<b>5</b>
2.2	5	5
<b>3 Annual gross gambling yield (GGY) % contribution to safer gambling</b>	<b>10</b>	<b>10</b>
3.2	10	10
<b>4 Protection of children, young adults and vulnerable customers</b>	<b>8</b>	<b>8</b>
4.8	8	8
<b>5 Customer information, profiling and interaction</b>	<b>17</b>	<b>15</b>
5.4	2	-
5.11	5	5
5.12	5	5
5.14	5	5
<b>6 Product design and innovation in safer gambling tools and the deployment of products in environments which minimise the risk of customers experiencing gambling-related harm</b>	<b>11</b>	<b>0</b>
6.4	5	-
6.5	3	-
6.6	3	-

<b>7 Self-exclusion</b>	<b>4</b>	<b>4</b>
7.6	2	2
7.9	2	2
<b>8 Advertising and promotion</b>	<b>4</b>	<b>2</b>
8.2	2	2
8.12	2	-
<b>9 Staff training and development</b>	<b>4</b>	<b>4</b>
9.5	2	2
9.6	2	2
<b>10 Addressing problem gambling amongst staff</b>	<b>2</b>	<b>2</b>
10.3	2	2