



Safer Gambling Standard

For Business to Consumer Gambling Businesses

Version 3.1 2021

Contents

1. Introduction.....	2
2. Scope	2
3. Eligibility	3
4. Levels of the Safer Gambling Standard	4
5. Accreditation process	6
5a. Overview	6
5b. Timeline	6
5c. Self-assessment questionnaire and evidence submission	6
5d. Assessment report	7
5e. Assessment reviews.....	7
5f. Responsibilities during accreditation period.....	7
6. Safer Gambling Standard Review Panel.....	8
7. Gambling businesses not licensed by the UK Gambling Commission.....	8
8. Terms and definitions	8
ANNEX 1 The Safer Gambling Standard	11
ANNEX 2 Maximum Percentage Scores for Advanced Level Requirements.....	28

1. Introduction

The Safer Gambling Standard accreditation scheme recognises gambling businesses 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**.

Five Reasons to Apply for the Standard

1. Allows consumers, the gambling industry, and other stakeholders to identify gambling businesses who have adopted high standards in safer gambling.
2. Gambling businesses can see how they compare to others in the area of safer gambling.
3. Gambling businesses receive expert, independent advice throughout the process and an assessment report upon completion.
4. The Standard is reviewed on an annual basis to ensure it continues to promote good practice and builds 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 Businesses

- The names of accredited gambling businesses and the level of the award they have achieved can be found at: www.safergamblingstandard.org.uk.
- Accredited businesses 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 businesses in order to establish, implement and maintain policies and processes that support safer gambling. Businesses 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. Spend on safer gambling including the most recent percentage annual Gross Gambling Yield (GGY) contribution to organisation(s) that undertake research, prevention, and treatment (RPT)* on the subject of gambling-related harm. * RPT was formerly referred to as RET (Research, Education and Treatment)
4. Protection of children and young adults
5. Customer information, profiling and interaction, and additional controls for vulnerable and high value customers
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 of these ten areas of the Safer Gambling Standard, businesses need to meet several criteria (see **ANNEX 1**).

Businesses 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 businesses from all sectors – betting, gaming, and lotteries - can achieve the Safer Gambling Standard.

To apply to the scheme a gambling business must:

- Be licensed by the UK Gambling Commission
- Be trading for at least 6 months
- Provide gambling services and products to individual customers (consumers)

Where relevant, gambling businesses can ask to be assessed against either or both their land-based and online operations.

4. Levels of the Safer Gambling Standard

To recognise gambling businesses 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** one or more Advanced Level criteria.
- Each Advanced Level Item of the Standard has a percentage attached to it which is the maximum that can be scored for that particular item.
- Certain criteria apply to both the Base and Advanced Levels. As set out above, these criteria must be met to achieve the Base Level of the Standard. However, the particular level of any Advanced award (1-3) will be dependent on the degree to which Base Level criteria have been exceeded.

Businesses 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
Advanced Level 3 <i>Met 61-100% of Advanced Level criteria</i>	The Business has adopted a wide range of robust safer gambling measures that go beyond the social responsibility provisions of its gambling licence.	<p>The Business makes an annual contribution of at least 0.5% of Gross Gambling Yield (GGY) to safer gambling, and at least half of this contribution must be made to organisations that undertake safer-gambling related research, prevention, and treatment. The Business also meets most or all of Safer Advanced Level requirements at a high level which includes but is not limited to:</p> <ul style="list-style-type: none"> • Has a clear senior level focus on safer gambling which is understood by customers and employees of the business • Has increased resources devoted to safer gambling both in terms of staff numbers and/or quality of staff training • Has no significant weaknesses in customer risk models or interaction processes • Regularly reviews and improves customer risk and interaction processes • Has not been subject to regulatory/enforcement action by the Gambling Commission during the period of assessment

		<ul style="list-style-type: none"> • Demonstrates a greater likelihood of supporting and ultimately refusing to accept business from anyone identified as a problem gambler at an early stage • Has an integrated approach to safer gambling across its business and regularly evaluates and improves measures aimed at preventing gambling harms • Customer information on safer gambling is clear and easy to understand
<p>Advanced Level 2 <i>Met 31-60% of Advanced Level criteria</i></p>	<p>The Business is developing or has adopted a range of safer gambling measures that go beyond the social responsibility provisions of its gambling licence.</p>	<p>The Business makes an annual contribution of at least 0.5% of Gross Gambling Yield (GGY) to safer gambling, and at least half of this contribution must be made to organisations that undertake safer-gambling related research, prevention, and treatment. The Business also has most of the attributes of Advanced Level 3. Such attributes will include but not be limited to:</p> <ul style="list-style-type: none"> • A clear senior level focus on safer gambling which is understood by employees within the business • Regularly reviews and improves customer risk and interaction processes • Customer information on safer gambling is clear and easy to understand
<p>Advanced Level 1 <i>Met up to 30% of Advanced Level criteria</i></p>	<p>The Business is developing or has adopted some safer gambling measures that go beyond the social responsibility provisions of its gambling licence.</p>	<p>The Business makes an annual contribution of at least 0.5% of Gross Gambling Yield (GGY) to safer gambling, and at least half of this contribution must be made to organisations that undertake safer-gambling related research, prevention, and treatment. The Business also has some of the attributes of Advanced Level 3. Such attributes may include but not be limited to:</p> <ul style="list-style-type: none"> • A clear senior level focus on safer gambling which is understood by employees within the business • Customer information on safer gambling is clear and easy to understand

Base Level	The Business meets the social responsibility provisions of its gambling licence.	The Business makes an annual contribution of at least 0.2% of Gross Gambling Yield (GGY) to safer gambling and at least half of this contribution must be made to organisations that undertake safer-gambling related research, prevention, and treatment. Business can also demonstrate one or more attributes of Advanced Level 3.
-------------------	--	--

5. Accreditation process

5a. Overview

A Safer Gambling Standard assessment involves:

- The review of a gambling business's policies, procedures, systems, controls, and approaches to customer interaction
- Visits to head office location(s) (This work may also be carried out by video conference)
- Interviews with management and staff
- Website and premises reviews

The assessment examines a range of areas to get a true sense of a business's leadership and 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 gambling businesses to agree the format of the assessment including the personnel involved . The assessment focuses on a review of evidence relating to the business's approach to minimising gambling-related harm.

5b. Timeline

The Safer Gambling Standard assessment process usually takes between 2 and 10 days depending on the size of the business being assessed. The process can take longer in some cases, such as when a business has online and land-based activities, and for land-based businesses with a large number of retail premises. The length of time the process takes also depends upon the time it takes the gambling business being assessed to provide evidence in support of its Safer Gambling Standard Award.

5c. Self-assessment questionnaire and evidence submission

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

For those businesses that 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. This applies to gambling businesses whether they are required to file an Assurance Statement with the Gambling Commission or choose to do so voluntarily,

5d. Assessment report

Upon completion of the Safer Gambling Standard assessment, the assessor issues an Assessment Report to the business which sets out which level of the Standard the business 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 business 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 business in response to the Assessment Report, GamCare will award the Standard at the appropriate level.

If the business 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 business 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 business 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. The result of an assessment review is not guaranteed as it is dependent on evidence provided.

5f. Responsibilities during accreditation period

Safer Gambling accreditation is a measure of the effectiveness of the approach a gambling business has to minimising gambling harms at a specific point in time. Accreditation lasts for a period of 2 years. As the Safer Gambling Standard is updated annually, businesses 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, a gambling business 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 gambling business must also advise GamCare before, during, or after the assessment, of any action being taken by the Gambling Commission which casts doubt on the effectiveness of the approach the business has to minimising gambling harms. This may include, but not be limited to, the instigation of a licence review, or any other compliance or enforcement action against the business which identifies weaknesses in systems and controls relating to customer protection. GamCare will work with the business to ensure that any weaknesses are remedied, but GamCare reserves the right to amend or temporarily remove content relating to the Safer Gambling Standard accreditation of a gambling business from the Safer Gambling Standard website whilst awaiting further information from that business relating to the action. GamCare may also revoke accreditation 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
- an impartial industry consultant

7. Gambling businesses not licensed by the UK Gambling Commission

The primary focus of the Safer Gambling Standard is on gambling businesses licensed by the UK Gambling Commission. GamCare will work constructively with gambling businesses 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. Businesses 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.

8. Terms and definitions

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

Assessor: An individual who is employed by GamCare to assess gambling businesses against the Safer Gambling Standard.

Assurance Statement: A document completed by the largest gambling businesses 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.¹

¹ SOURCE: BS EN ISO 9000:2015, 3.2.4

Customer identification and interaction: How a business 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.² Customer interactions are sometimes also referred to as proactive and reactive interactions:

- A proactive customer interaction is a business-led interaction with a customer based on concerns the business may have based on the customer's gambling activity.
- A reactive interaction is the Business's response to being contacted by a customer.

Gambling business: An organisation which provides gambling products or services to a customer. A gambling business may be a group or a company within a group. The term 'gambling operator' is sometimes used when referring to a gambling business that provides gambling products or services to a consumer. The Safer Gambling Standard criteria at **Annex 1** refers to gambling businesses as "The Business".

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

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

High Value Customers (HVCs): The customers gambling businesses identify as being of high commercial value and warranting enhanced customer service unavailable to the wider customer base. These customers are typically members of VIP Schemes.

Land-based gambling business: A business who offers gambling products or services to a customer in a physical location.

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

Online gambling business: A business that offers gambling products or services to a customer online. These businesses are also referred to as 'remote gambling businesses'.

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

Problem gambling: Gambling which compromises, disrupts or damages family, personal financial circumstances, 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.

² 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>.

³ SOURCE: Gambling Strategy Commission, National Strategy to Reduce Gambling Harm 2018

⁴ 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.⁵

Social responsibility: An ethical framework for businesses, but also used specifically in the gambling sector as an alternative to safer gambling.⁶

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).

⁵ SOURCE: Gambling Commission. Further information on self-exclusion is available from: www.gamblingcommission.gov.uk/for-the-public/Safer-gambling/Self-exclusion.aspx

⁶ 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

All Items of the Safer Gambling Standard should be achieved to reach the Base level of the Standard. Items shown with the symbol ✓ are Advanced Level items and those Items with the symbols ✓* are both Base and Advanced Level Items.

Higher marks are awarded based on evidence provided.

1 Corporate governance and risk management

To ensure the gambling business 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 Advanced Level
1.1	<p>The Business's Board and executive team shall demonstrate leadership in the area of safer gambling. This will include setting and reviewing safer gambling Key Performance Indicators (KPIs). The Business should also implement and maintain effective assurance processes to monitor its approach to safer gambling, ensuring that such processes are reviewed and evaluated at least annually. Businesses will score more highly where they can demonstrate the extent to which they:</p> <ul style="list-style-type: none"> • Provide leadership in the area of safer gambling. This could include having a public-facing safer gambling strategy, where the business is also able to demonstrate evidence of the strategy's implementation and its effectiveness in minimising gambling harms • Set, review, and periodically evaluate safer gambling KPIs, including ensuring that such KPIs are relevant to the business in minimising gambling harms • Review and implement the results from safer gambling assurance processes (such as periodic safer gambling audits) to ensure the approach to minimising gambling harms is embedded across all levels of the business <p><i>Note: Examples of safer gambling KPIs could include, but are not limited to:</i></p> <ul style="list-style-type: none"> • <i>Number of incidents and self-exclusion breaches</i> • <i>Number of customers designated as 'high risk' based on their gambling activity</i> 	<p>✓* (25%)</p>

	<ul style="list-style-type: none"> • <i>Percentage of customer interactions resulting in positive customer behaviour change</i> • <i>Customer take-up and impact analyses of safer gambling tools</i> 	
1.2	<p>The Business 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, and 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: The accountable person should be a member of the business'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 Business's approach to safer gambling.</i></p>	
1.3	<p>The Business 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.</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>	✓ (5%)
1.4	<p>(LAND-BASED) The Business 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>	
1.5	<p>(LAND-BASED) The Business 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 and action taken where necessary.</p> <p><i>Note: Updates to premises local area risk assessments would take into account factors such as changes in socio-economic circumstances of those within the local community.</i></p>	✓ (7%)
1.6	<p>(ONLINE) The Business shall not allow customers to gamble using credit cards where the use of credit cards for gambling is prohibited by regulatory requirements.</p>	

2 Collaboration and sharing best practice

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

Item		Required for Advanced Level
2.1	<p>The Business's approach to safer gambling shall include collaboration with competitors and other organisations on the subject of preventing gambling-related harm. The Business shall also be able to show the results of outcomes (including successes and failures) in respect of measures tested/implemented aimed at minimising gambling-related harm.</p> <p><i>Note: Results would commonly be shared with organisations with an interest in minimising gambling harm such as with other gambling businesses, trade associations, and regulators. The highest mark would be achieved by those businesses who collaborate with other organisations by sharing data and insights and publishing the results of research undertaken.</i></p>	✓* (5%)

3 Spend on safer gambling including the most recent percentage annual Gross Gambling Yield (GGY) contribution to organisation(s) that undertake research, prevention, and treatment (RPT) on the subject of gambling-related harm

The Business 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 Advanced Level
3.1	<p>The Business shall make an annual contribution of at least 0.2% of Gross Gambling Yield (GGY) to safer gambling. At least half of this figure must be made to organisations that undertake safer-gambling related research, prevention, and treatment. This is commonly known as the RPT Contribution. In the Safer Gambling Standard the RPT contribution is referred to as 'external spend'.</p> <p><i>Note 1: GamCare also accepts evidence of at least half of the annual GGY contribution to safer gambling as 'internal spend' where the Business can evidence that such spend has contributed to its own approach in preventing gambling harm amongst its customer base. Internal spend would include the costs of assessment against the Safer Gambling Standard and any safer gambling related training or consultancy provided by GamCare or other third parties.</i></p> <p><i>Note 2: Contributions required by a regulator as a result of regulatory action, such as regulatory settlement agreements, cannot be included in the annual contribution to safer gambling.</i></p>	
3.2	<p>The Business shall make an annual contribution of at least 0.5% of Gross Gambling Yield (GGY) to safer gambling. At least half of this figure must be external spend. (For the definition of external spend see Item 3.1 above).</p> <p><i>Note 1: GamCare also accepts evidence of at least half of the annual GGY contribution to safer gambling as internal spend. For the definition of internal spend see Note 1 of Item 3.1 above).</i></p> <p><i>Note 2: Contributions required by a regulator as a result of regulatory action, such as regulatory settlement agreements, cannot be included in the annual contribution to safer gambling.</i></p>	✓* (10%)

4 Protection of children and young adults

The Business 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 Advanced Level
4.1	The Business shall publicly display information regarding the legal age to gamble to all customers.	
4.2	The Business shall implement and maintain policies and procedures to verify a customer's age and prevent underage gambling, including on free to play games and fantasy games where such games are offered. Policies and procedures should also cover the risks associated with individuals who are underage being drawn to specific products. These policies should be evaluated for impact and reviewed as a minimum on an annual basis.	
4.3	If a customer is identified as underage the Business shall refund the original stake money and log an incident report.	
4.4	The Business shall verify the age of each customer in order to play free-play games.	
4.5	(ONLINE) The Business shall verify each customer's identity and age upon registration.	
4.6	<p>The Business shall implement more stringent criteria relating to risk indicators 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.</p> <p><i>Note 1: Examples of applying more stringent criteria for risk indicators for online businesses might include:</i></p> <ul style="list-style-type: none"> • <i>limiting direct marketing and push marketing messages, and applying advertisement blocking</i> • <i>obtaining information at an earlier stage where the customer's level or patterns of gambling identify an increased level of risk</i> <p><i>Note 2: For land-based businesses:</i></p> <ul style="list-style-type: none"> • <i>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</i> 	<p>✓ (8%)</p>

Note 3: For all businesses:

- *ensuring that more stringent criteria relating to risk indicators are applied from customer onboarding*
- *offering lower time and/or spend limits as standard*
- *ensuring staff are trained to deliver appropriate interactions at an earlier stage with customers in this age group*

5 Customer information, profiling and interaction, and additional controls for vulnerable and high value customers

5(a) Customer Information, profiling, and interaction

The Business 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 Advanced Level
5.1	<p>The Business shall implement and maintain effective policies and procedures to risk profile, identify and interact with their customers ensuring that safer gambling interactions are based on each customer's risk profile.</p> <p>These policies and procedures shall be evaluated for impact and reviewed at least annually. They should show that safer gambling interactions are tailored to each customer's risk profile and placed above commercial consideration including when dealing with groups such as the vulnerable, young adults, and high value customers (HVCs). This would also include ensuring that the customer base is not experiencing harm by lowering standards, such as through encouraging customers to spend more on higher risk products at times when other products may not be available*. (*e.g. certain products were not available during the Covid-19 pandemic).</p> <p>Such policies and procedures should also include but not be limited to:</p> <ul style="list-style-type: none"> • Defining, identifying, and interacting with customers who may be showing signs that they are vulnerable, which should also include a process for referral of customers displaying a high-level of vulnerability (e.g. threat of self-harm) to relevant sources of support • Showing how the business deals with HVCs, certain of whom may be assessed as vulnerable at specific points in time • Acknowledging and responding to notice of a customer experiencing harm from gambling by a third party, such as a family member <p><i>Note 1: Examples of risk indicators might include but not be limited to:</i></p> <ul style="list-style-type: none"> • <i>Customer registration information</i> 	<p>✓* (15%)</p>

	<ul style="list-style-type: none"> • <i>Self-exclusion and time out data</i> • <i>Gameplay data</i> • <i>Information to support whether a customer's spending is affordable and sustainable</i> • <i>Payment method and changes in payment method data</i> • <i>Data on complaints and disputes</i> • <i>The type of gambling product used by the customer</i> • <i>Behaviours observed in land-based venues indicating customers may be experiencing harm from gambling</i> <p><i>Note 2: The Risk Model of the Business</i></p> <p><i>The Risk Model of the Business can also be a factor in mitigating the risk of customers experiencing gambling harms. This could be influenced by the types of gambling product offered, or include having no HVC or VIP Scheme, closing the VIP Scheme, or reducing the reliance on HVCs. Where the business does have a HVC or VIP scheme, Gamcare will consider as part of its assessment how those schemes are managed by the business and risks mitigated.</i></p>	
5.2	<p>The Business shall display and make customers aware of sources of help and support including as a minimum:</p> <ul style="list-style-type: none"> • 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 • Advice and information on the availability of safer gambling player protection tools including any measures provided to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend • Information on an accepted and simple safer gambling self-assessment process to enable the customer to consider their gambling behaviour 	
5.3	<p>(ONLINE) The Business shall comply with requirements and good practice recommendations within the latest version of the GamCare Industry Code for the Display of Safer Gambling Information, and the safer gambling web page shall be free from gambling advertising and promotions.</p> <p><i>Note: The score achieved for Advanced Level relates to the extent to which good practice in the display of safer</i></p>	<p>✓* (5%)</p>

	<i>gambling information has been followed and exceeded.</i>	
5.4	The Business shall have effective systems and controls in place to maintain and log all customer interactions.	
5.5	<p>The Business 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 businesses this is for time periods of not less than those required by relevant regulations, including the Remote Technical Standards (RTS) issued by the UK Gambling Commission.</i></p> <p><i>Note 2: For land-based businesses a customer's account history might be limited or unavailable depending on the type of product purchased. The Business should justify what information is possible to provide and give examples of how and what type of information has been provided.</i></p>	
5.6	The Business 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.	
5.7	<p>The Business 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.</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%)
5.8	<p>(ONLINE) The Business shall not offer a facility for customers to cancel withdrawals.</p> <p><i>Note: Online businesses 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(b) Protection of Vulnerable Customers

The Business has effective systems and controls in place to define, identify and interact with customers showing signs of vulnerability. The definition for vulnerability could include changes in a player's behaviour which may have been brought about by external events or changes in their economic and social circumstances. Customer Interaction Guidance for Remote and Non-Remote Businesses issued by the Gambling Commission in July 2019 are examples of documents which include information on factors which can indicate customer vulnerability. Businesses 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.

5.9	<p>The Business 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">• Providing information on how to identify and interact with vulnerable customers within safer gambling policies and training• 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 Business has identified as 'high risk' of experiencing gambling-related harm based on their behaviours, and ensuring that customers displaying a high level of vulnerability (e.g. threat of self-harm) are referred to relevant sources of support• (ONLINE) Setting additional or modifying existing thresholds and triggers which are specific to new customers reflecting the reduced level of knowledge of that individual's play and spend patterns• (ONLINE) Demonstrating how all thresholds and triggers including spend, and time spent playing of 1 hour or more, have been adapted to track vulnerability to ensure that they can better identify changes in personal circumstances that many consumers may be experiencing, such as those from the impact of the Covid 19 pandemic• (ONLINE) Conducting assessments of affordability on thresholds and triggers adapted to better identify customers who may be experiencing harm and demonstrate the action taken to limit or block further play until checks have been concluded and supporting evidence obtained	
-----	--	--

5(c) Additional controls in place for High Value Customers (HVCs)

The Business is able to demonstrate the systems and controls it has in place to comply with the requirements of the Gambling Commission Guidance on High Value Customers (HVC) issued in September 2020. Individuals whose gambling custom is of high commercial value to businesses are often labelled as 'VIPs', 'high value customers (HVCs)', or equivalent. Such customers might receive tailored bonuses, gifts, hospitality, and preferential service, and can also be more heavily engaged gamblers in terms of their gambling spend, the frequency with which they gamble, or both.

5.10	<p>The Business shall demonstrate the systems and controls it has in place to comply with the requirements of the Gambling Commission Guidance on High Value Customers (HVC) issued in September 2020. This will include as a minimum:</p> <ul style="list-style-type: none">• How the Business defines HVCs or VIPs• Assessing and mitigating risk by being able to demonstrate how evidence has been obtained to ensure that each customer's spending is affordable and sustainable, which should include up to date information on identity, occupation, and source of funds• Demonstrating how all thresholds and triggers including spend and time spent playing have been adapted to assess whether there is evidence of gambling-related harm or heightened risk linked to vulnerability• Implementing effective policies and procedures for the operation and governance of their HVC schemes• Maintaining a full audit trail of all contact with HVCs• Ensuring that any incentives should not be used to exploit vulnerable customers or encourage problematic behaviours such as chasing losses, excessive time or money spent gambling, or accelerating frequency of gambling	
------	--	--

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 Business 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 Advanced Level
6.1	<p>The Business 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 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> <p><i>Note: The Business shall ensure that their products are designed and tested to ensure compliance with relevant gambling regulations.</i></p>	
6.2	<p>(ONLINE) The Business 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 Business 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>(ONLINE) The Business shall record and monitor all requests to alter a customer's previously set limits.</p>	
6.5	<p>(ONLINE) The Business shall review and evaluate the impact of current safer gambling tools and the implementation of new safer gambling tools.</p>	
6.6	<p>(ONLINE) The Business shall give customers the opportunity to opt-in to:</p> <ul style="list-style-type: none"> • use each category of product offered, for example, casino games, in-play betting • gamble only at certain times of the day (e.g. before 10 p.m.) 	<p>✓ (2%)</p>

7 Self-exclusion

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

Item		Required for Advanced Level
7.1	The Business 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 Business's self-exclusion process shall be visible to the customer.	
7.2	The Business shall have joined a multi-operator self-exclusion scheme(s) relevant to its business activities, and shall communicate advice to the customer to self-exclude from all other betting and gambling activities and signpost the customer to the relevant multi-operator self-exclusion scheme(s) and support services (e.g. GamCare support).	
7.3	Upon self-exclusion, the Business shall close all customer accounts and memberships, and any outstanding balance should be returned to the customer. The Business shall remove the customer's details from any business and affiliate marketing lists.	
7.4	The Business 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.	
7.5	The Business 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%)
7.6	The Business 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.	
7.7	(ONLINE) The Business 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.	
7.8	The Business shall review and evaluate for impact its self-exclusion policies and procedures, as a minimum, annually.	
7.9	The Business shall provide product blocking and/or advertisement blocking software to self-excluded customers.	✓ (3%)

8 Advertising and promotion

The Business'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 Advanced Level
8.1	<p>The Business'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 (IGRG).</i></p>	
8.2	<p>The Business 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/themes providing the illusion of power, bravery or strength. The Business shall also apply the same high standards to sponsorship, (e.g. not sponsoring products aimed at children).</p>	<p>✓ (5%)</p>
8.3	<p>If affiliates are used the Business shall implement and maintain effective systems and controls for the supervision of affiliates, including how affiliates use social media to advertise gambling products.</p>	
8.4	<p>The Business shall require customers to take a positive action to opt-in to direct marketing.</p>	
8.5	<p>In addition to ensuring that effective systems and controls are in place that prevent self-excluded customers from being sent marketing materials, the Business shall prioritise the protection of customers by:</p> <ul style="list-style-type: none"> • No longer marketing to customers, such as promotions or bonus offers, from the point that they have been identified as a high-risk of being harmed by gambling • Marketing high risk products to customers where the products they usually use are no longer available <p><i>Note 1: This Item commonly impacts online businesses but can also apply to land-based businesses where the Business holds customer data and sends the customer marketing communications.</i></p> <p><i>Note 2: Research conducted in 2020 during the Covid 19 pandemic showed that regular sports bettors who changed their gambling activities during the initial Covid-19 lockdown, especially those starting to gamble on online slots or casino games, were disproportionately likely to be experiencing gambling harms.</i></p>	

8.6	The Business shall not coerce or imply that customers are obliged to take part in publicity.	
8.7	The Business shall establish and maintain a social media advertising policy that protects customers from gambling-related harm.	
8.8	The Business's advertising policies shall be evaluated for impact on customer protection and reviewed at least annually.	
8.9	<p>The Business'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 businesses:</p> <p>(ONLINE) The Business's terms and conditions of any loyalty of bonus scheme shall be no more than one click away in online advertising</p> <p>(ONLINE) Any refer a friend scheme shall be routed to the safer gambling page where the legal age to gamble of 18 and over is stated (over 16 where gambling on lotteries is permitted)</p>	
8.10	The Business shall not imply that participation in a loyalty or bonus scheme increases the customer's chances of winning.	
8.11	<p>(ONLINE) Businesses who develop free play games shall ensure that such games avoid the issue of desensitising and normalising playing at enhanced stakes in real money, with gameplay restricted to lower amounts or fictional currency. Such games should also be identical to real play games, including, but not limited to:</p> <ul style="list-style-type: none"> • Over 18 messaging • Auto-play functions (if Auto-Play functions are allowed by relevant regulatory requirements) • Game odds • Pay-out percentages • Links and information on how to play 	

9 Staff training and development

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

Item		Required for Advanced Level
9.1	<p>The Business 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 Business 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 Business 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 Business shall customise its safer gambling training for specific groups of staff.</p> <p><i>Note: For example, directors and senior management, staff in VIP/high value customer or marketing functions, and non-executive directors (NEDs).</i></p>	<p>✓ (5%)</p>
9.5	<p>The Business's training materials shall be reviewed at least annually and updated as required. The Business shall log training attendance and completion of training shall be evidenced and evaluated.</p>	<p>✓ (5%)</p>

10 Addressing problem gambling amongst staff

The Business embraces a culture of accountability and support to foster safer gambling amongst staff who gamble.

Item		Required for Advanced Level
10.1	The Business 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. <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>	
10.2	The Business shall implement and maintain policies and procedures to respond to a staff member that has a self-acknowledged problem with gambling and shall review these policies and procedures at least annually.	

ANNEX 2 Maximum Percentage Scores for Advanced Level Requirements

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

Section	Online Business %	Land-based Business %
1 Corporate governance and risk management	30	37
1.1	25	25
1.3	5	5
1.5	-	7
2 Collaboration and sharing best practice	5	5
2.1	5	5
3 Annual gross gambling yield (GGY) % contribution to safer gambling	10	10
3.2	10	10
4 Protection of children and young adults	8	8
4.6	8	8
5 Customer information, profiling and interaction, and additional controls for vulnerable and high value customers	25	20
5.1	15	15
5.3	5	-
5.7	5	5
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	2	0
6.6	2	-
7 Self-exclusion	5	5
7.5	2	2

7.9	3	3
8 Advertising and promotion	5	5
8.2	5	5
9 Staff training and development	10	10
9.4	5	5
9.5	5	5
10 Addressing problem gambling amongst staff	-	-