



GLOBAL GAMBLING GUIDANCE GROUP

# **G4**

## **Responsible Gambling**

### **Code of Practice**

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## I. Index

Introduction.....	4
1. Responsible Gambling Code of Practice .....	5
2. Corporate Standards.....	5
2.1 Licensing.....	5
2.2 Audit and inspection.....	6
2.3 Credit gambling.....	6
2.4 Money laundering.....	6
2.5 Privacy .....	6
2.6 Complaints and disputes.....	6
2.7 Stakeholder engagement and research.....	7
2.8 Policies.....	7
3. Operational Code of Practice.....	7
3.1 Age verification/Know your Customer.....	7
3.2 Social responsibility/Player protection information .....	8
3.3 Advertising and marketing.....	8
3.4 Bonusses, cash-back and incentives.....	9
3.5 Risk-assessments. ....	9
3.6 Gambling for fun or free.....	9
3.7 Player account .....	9
3.8 VIP Policy.....	9
4. Training.....	10
4.1 Staff Training.....	10
5. Player Protection Tools.....	10
5.1 Reality Checks.....	10
5.2 Informed choice .....	10
5.3 Player led session limits.....	11
5.4 Player led deposit limits.....	11
5.5 Self-Exclusion.....	12
5.6 Exclusion of specific products.....	12
5.7 Identifying problem gambling behaviour .....	13
5.8 Alcohol and Drug policy for players/guests.....	13
6. Staff and Responsible Gambling .....	14



7. Staff and Problem Gambling.....	14
8. Player Protection Framework.....	14



## Introduction

G4, the Global Gambling Guidance Group, aims to minimise the impact of problem gambling by promoting a worldwide accreditation and certification programme.

In many parts of the world the gambling industry is being urged to develop responsible gambling programmes to minimize the impact of problem gambling on communities and individuals. This initiative has come from governments, regulators of industry, researchers, treatment providers and the communities and individuals themselves.

G4 is the brainchild of a group of international experts in the field. Between them they have many years' experience of working with the gambling industry worldwide to encourage responsible gambling and to minimize the harm caused by problem gambling. Their experience covers drafting responsible gambling programmes, devising and delivering training programmes for staff in gambling venues, online operators and suppliers as well as running help lines, online and face-to-face counselling services for problem gamblers themselves.

These experts have designed an accreditation programme that will set the international benchmark for responsible gambling. This accreditation programme will provide a model for the gambling industry and an opportunity for companies to demonstrate how seriously they take the concerns regarding problem gambling.

G4 has the expertise to implement this Code of Practice within your gambling environment to be part of the integral daily operations, working in parallel with your jurisdictional gambling laws and regulations. By certifying responsible gambling, G4 offers the opportunity for responsible operators and suppliers to raise their profile.



## 1. Responsible Gambling Code of Practice

This Code is to be used as a guide only. The Code pays attention to all areas that are related to gambling and Corporate Social Responsibility in general and Responsible Gambling in particular.

This code must be matched to the legislation applying to the relevant jurisdiction.

G4 identifies the following distinctive areas of gambling:

- Online-gambling
- Online-betting
- Land based casino gambling
- Lotteries
- Suppliers (technology providers)
- Daily Fantasy Sports
- E-sports
- Social (casino) games

When applicable: in the annex related to this Code of Practice you will find specific measures related to different areas of gambling mentioned above.

The operator and/or supplier is committed to endorsing responsible gambling as well as promoting the awareness of problem gambling and improving prevention, intervention and treatment. The company's Responsible Gambling Policy sets out its commitment to minimising the negative effects of problem gambling and to promote responsible gambling practices.

Commitment of senior level management can be demonstrated by, although not limited to, regular communication about Responsible Gambling related policies and practices, and corporate statements on Responsible Gambling such as mission statements.

An example of a Responsible Gambling statement could be: 'We believe it is our responsibility to you, our customers, to ensure that you enjoy your experience on our site, while remaining fully aware of the social and financial harms associated with problem gambling'. All G4 accredited companies have devised their own unique responsible gambling mission statement.

## 2. Corporate Standards

### 2.1 Licensing

The operator and/or supplier must have a license similar to that which applies to other members of the gambling industry. The objective of the licensing scheme is to protect the public interest through ensuring high standards of honesty and operational ability of the games service provider and probity checking of any other party that is in a position to directly or indirectly benefit financially from the conduct of the operator and/or supplier.





It must be possible for the players, and others, to actively view the regulations governing the operator's and/or supplier's business on the website either on request or by providing information and/or links to the regulator's website.

Affiliates are considered to act under the operator's and/or suppliers policy and therefore act according to this G4 Responsible Gambling Code of Practice.

## 2.2 Audit and inspection

The operator must allow the regulator and/or G4 auditors, to test, evaluate and audit systems and procedures at the service provider's premises by inspecting records, examination, verification of equipment, testing software in use and staff interviews.

This audit/inspection must be actioned by the operator and/or supplier, with a base audit every three years as a minimum and a follow-up audit in between (every 18 months).

A test account is provided to the auditor with a minimum of €20,00 (or the equivalent in applicable currency) at least two weeks in advance of the audit visit on site, to provide an insight of the operations on a user/customer level (only applicable to online operations).

## 2.3 Credit gambling

The operator does not provide services to gamble on credit.

## 2.4 Money laundering

The operator should take all measures possible to identify all transactions especially those that bear the characteristics of money laundering and terrorist financing activity. The anti-money laundering guidelines have to be in line the European Union Fourth Anti-Money Laundering Directive.

## 2.5 Privacy

The operator and/or supplier must control and guard the privacy of the player. This must be done in a technical way so that the player information database is stored securely and all the laws in the jurisdiction are adhered to.

A data retention policy may be implemented by the operator to govern the length of time data is held, however any stored data must be provided when instructed to do so by a player upon verification of the player identity. As a standard the account records will be kept for at least 5 years.

## 2.6 Complaints and disputes

The operator and/or supplier has a complaints and disputes procedure in place including a 3<sup>rd</sup> party complaint policy taking into account the legal, regulatory and operator's/supplier's Responsible Gambling policy.



## 2.7 Stakeholder engagement and research

Stakeholder engagement is a key part in a responsible policy, therefore the operator and/or supplier actively participates in Stakeholder Engagement and research.

The operator and/or supplier will identify all relevant stakeholders; governments, regulators, academics, business partners, player representatives, employees and treatment organizations.

- a) Operators will meet and exchange information with their stakeholders.
- b) Operators work together with research institutes and promote the results of research and studies, including those of independent sources.

## 2.8 Policies

To make sure key processes are documented and easily accessible the operator and/or supplier makes sure the following policies (at a minimum) are available

- a) 3<sup>rd</sup> party complaint policy
- b) Young adults gambling policy
- c) Staff problem gambling policy
- d) Complaints/disputes policy

## 3. Operational Code of Practice

### 3.1 Age verification/Know your Customer

- a) Operators must take steps to verify the age and identification of every new player. Operators should either employ the use of a reliable electronic checking system or request visual proof of age and ID such as, but not restricted to, driving licence, identification card or passport and/or via the provision of a social/fiscal number.  
This is especially important in all cases where the method of payment does not itself constitute an age check (e.g. debit cards). The operator provides a description of the KYC method that is used. This is also the case when verification is done by a 3<sup>rd</sup> party.
- b) All sites/venues must clearly display an 'over 18's only' or other legislated age requirement sign.
- c) Sites/venues must also clearly display that underage gambling should not take place, even in the company of parents or other adults over the legal gambling/betting age.
- d) Through the registration process there should be a clear message regarding underage gambling and the steps the operator takes to check on age. This will act as a deterrent to minors attempting to access an operator's site/venue.



## 3.2 Social responsibility/Player protection information

The Player Protection information should contain at a minimum:

- a) A warning that gambling could be harmful if not controlled and kept in moderation.
- b) Advice on responsible gambling and a link to the social responsibility partner G4 and other sources of help on problem gambling, including, but not limited to helpline number(s), email addresses and/or chat services.
- c) A link to or information on an accepted self-assessment tool to determine risk potential.
- d) Messages of the operator's/supplier's support of social responsibility/player protection that can be perceived as misleading. (i.e. it should not claim to be a member of or have support for a social impact or support organisation, if this is not true.)
- e) A list of player protection measures that are available on the site, and a link to that page (if separate from the responsible gambling/player protection page).
- f) Link(s) to a recognised filtering programme to enable players to prevent minors from accessing gambling sites.
- g) Details or a link to a page with details, of the operator's Responsible Gambling policy.
- h) The deposit page should contain a reminder to the player to gamble responsibly, with a link to the responsible gambling/player protection page. This information must be clearly visible.
- i) There are no promotions or minigames displayed on the responsible gambling/player protection page.

## 3.3 Advertising and marketing

Advertising and marketing statements must be socially responsible.

- a) Advertising must not target those under the legal gambling/betting age. This includes not only content but placement of advertising as well.
- b) Advertisement should not target moderate and high risk groups (including means of peer-pressure).
- c) Advertising should give a balanced message with regards to winning and losing.
- d) Players should not be encouraged to chase their losses or re-invest their winnings.
- e) At no time should it be suggested that gambling/betting is a means of solving financial difficulties.
- f) Excluded customers may not be contacted/approached/targeted by marketing campaigns.
- g) Online providers who are active on any social media platform, have a marketing strategy that acknowledges responsible gambling.





### 3.4 Bonusses, cash-back and incentives

The operator has a strategy/policy on bonuses, cash-back and incentives in relation to player protection.

To ensure fair and open marketing and advertising, the use of bonuses and incentives is not allowed to be misleading, unreasonable or promote unsafe gambling.

Included in, but not limited to, bonuses and incentives are:

- Sign-up bonuses
- Free bets (or related) bonuses
- Cash-back bonuses
- Player loyalty programmes/cards

The policy on bonuses, cash-back and incentives come with clear terms and conditions and are clearly displayed on the website.

### 3.5 Risk-assessments

Operator/supplier should ensure that risk-assessments have been carried out on a product level.

### 3.6 Gambling for fun or free

Where Gambling for fun or Free Gambling is offered, the following conditions must be met:

- a) the free stakes must mirror the real stakes in pay out percentages and method of gambling/betting;
- b) the free stakes must offer the same age restriction, responsible gambling and player protection information as the real money site/venue.

### 3.7 Player account

- a) The player should only be able to register one account and not multiple accounts with the same name and address but different user names.
- b) The player should preferably only be allowed to use or register one debit card and/or credit card or other form of payment for their account. The maximum of active credit cards to be used is limited to one (1).

### 3.8 VIP Policy

The operator has appropriate and sufficient measures in place, ensuring that possible signs of problematic gambling behaviour are detected at the earliest stage possible, and to minimize the chance of the unintentional co-creation of problematic gambling.



The operator must take steps to provide a deliberate company policy on VIP/special membership players, and has a system in place for VIP-customer handling staff with regards to Responsible Gambling.

## 4. Training

### 4.1 Staff Training

All employees receive a general awareness training, specific customer facing staff should receive an in-depth training.

The operator and/or supplier should ensure that their customer support team is trained on the issues of social responsibility, responsible gambling and problem gambling.

This is especially important for the situation when a problem gambler, and/or a third party, contacts the customer support team, or when the operator and/or supplier suspects one of their players may have a gambling problem.

This training should be refreshed every three years and records of staff training conducted must be kept by the operator and/or supplier.

When applicable and as part of the gambling, alcohol and drugs policy (see 6.8) all employees should receive general information on this, customer facing staff should receive more in-depth information.

## 5. Player Protection Tools

### 5.1 Reality Checks

It is vital that, where the operator allows continuous and rapid gambling/betting without a reasonable break, there should be mechanisms implemented that help the player to monitor their losses so they can make conscious decisions as to whether to stop or continue.

The operator provides opportunities to the player, to take note of the passage of time. This may be done by providing a clock or digital time display. The operator may also choose to implement other methods of providing reality checks to the customer related to the passage of time.

The currency unit of the stake should be clearly displayed on the current account balance, and should not be converted to a credit system.

### 5.2 Informed choice

The operator provides a variety of information to assist players in making informed decisions about their gambling including the:



- chances (probability) of winning on the activity
- pay-out ratios of the game
- price structures of the game
- presence of a Personalised Player Feedback System (recommended)

There is also an implicit assumption that all games will be fair and designed in such a way to protect the players.

Upon registration, the operator provides the player the option to set limits on time, money and winnings or losses. In the case of an already established cooperation between the company (auditee) and G4, the company is provided one year in order to comply.

### 5.3 Player led session limits

To assist the player in controlling their gambling/betting and protecting against the possibility of continuous and rapid gambling without a break, the player should have the option of setting a session duration limit. This limit will determine how long the player will be able to gamble/bet until a break is enforced. This should apply to any form of gambling that involves continuous gambling.

- a) The player should be able to set the session time limit as a default for all sessions.
- b) If a session duration limit is not set by the player then a default of four hours should be the maximum default time for all players.
- c) When the session duration has expired and, on completion of the last stake, a message should appear to inform the player that their time has elapsed and if they wish to continue they will have to re-enter the site from the log-in screen or re-enter via another measure that is available. At that point they should have to acknowledge the message by clicking on it. The screen will then close and the player will be brought back into the site's menu screen so they have to log-in if they wish to continue. This process should take no less than 10 seconds.

### 5.4 Player led deposit limits

Operators are able to provide limits on player deposits and vary those limits on an individual basis. Operators should also provide the ability for the player to determine their own deposit limits.

- a) Sites should provide options for setting limits on player deposits per day, per week and/or per month and/or any other reasonable period of time that the operator and G4 have agreed on or in accordance to regulatory requirements.



- b) When a player reaches their previously set limit the operator will be responsible for ensuring that no other stakes are accepted.
- c) The player can only increase his previously set limit once a cooling off period of at least 24 hours has elapsed. The increase in deposit limit must not take place for 24 hours up to 7 days. However, he should be able to decrease the limit with immediate effect.

## 5.5 Self-Exclusion

The player should be able to exclude himself from making any gamble/bet on a site/venue.

- a) The site should provide a cooling off period for a minimum of 24 hours up to 7 days.
- b) The period of self-exclusion must be as an absolute minimum of one month. However, it is advised to offer a variety of standards/measures related to the length of the self-exclusion period (tailormade).
- c) Information regarding the self-exclusion policy and process must be clearly explained within the responsible gambling/player protection page.
- d) Once a player has excluded himself from the site, the following must occur:
  - I. Any stakes placed on future events should be cancelled and refunded where possible and reasonable. Should such cancellation of stakes contradict either operator's policy or legislation in place, any winnings must be paid out by operator.
  - II. The player must be taken off any mailing lists they have subscribed to on the operator's/supplier's site and their database record should be flagged to prohibit mail outs/promotions during the self-exclusion period.
  - III. The confirmation email on the successful registration in the self-exclusion scheme contains information on local or national support schemes such as for example treatment centres, counselling services or self-help groups.
- e) In the event of a third party making the application for an exclusion, such a party must, in the opinion of operator's appointed officer that is responsible for the responsible gambling programme, be "a person who has a close personal interest in the welfare of the person for whom the prohibition is sought".

## 5.6 Exclusion of specific products

To assist the player in controlling their gambling/betting and protecting against uncontrollable losses, players are offered to block access to specific gambling products.



## 5.7 Identifying problem gambling behaviour

When the operator identifies signs of problem gambling behaviour they will take relevant steps to investigate and satisfy any concerns.

Possible indications might include, but are not limited to, comments via chat room, email contact, conversations with employees/staff members, number of plays, repeatedly increase their gambling/betting limits.

It is advised to implement an alcohol and drug policy. When the operator identifies signs, they will take relevant steps to investigate and satisfy any concerns.

## 5.8 Alcohol and Drug policy for players/guests

When applicable, it is advised that an alcohol and drug policy is made available to customers.





## 6. Staff and Responsible Gambling

Commitment to Responsible Gambling is further consolidated in the continuous appointment of a board member or senior staff member. The responsibilities of board member/senior staff member are concerned with the implementation of RG policies and procedures, and in the oversight (quality management) of these policies and procedures. Job descriptions/profiles used for hiring of staff, contain clear descriptions of the specific responsibilities related to the Responsible Gambling as part of the overall job responsibilities.

## 7. Staff and Problem Gambling

Staff working in the gambling industry are more likely to develop a gambling problem than the general public. There are a lot of factors that can contribute to this, however a number of key-factors are:

- Frequent exposure to gambling products
- Close interaction with (problem) gamblers
- Devaluation of money and normalising of heavy gambling
- Shift work can lead to social isolation

To assist staff confronted with a gambling problem, an adequate policy or Employee Assistance Programme (EAP) is implemented within the company.

In addition it's advised to develop an alcohol and drug policy as well as part of the EAP of the company.

## 8. Player Protection Framework

For reference the accredited company has developed a Player Protection Framework.

The framework has the following principles:

- It serves as a place where information is gathered
- It entitles some form of documented information
- It serves as a place for systematic improvement
- Information can be measured

The framework is to be updated on an ongoing (minimum one time per year) basis.