

hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)

### **Financial events**

- 5** Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
- 6** Any breach of a covenant given to a bank or other lender.
- 7** Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
- 8** Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

### **Legal or regulatory proceedings or reports**

- 9** The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain).
- 10** Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities of a person in a 'key position', where such an investigation could result in the imposition of a sanction or penalty which could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
- 11** Any criminal investigation by a law enforcement agency in any jurisdiction in which the licensee, or a person in a 'key position' related to the licensee, is involved and where the Commission might have cause to question whether the licensee's measures to keep crime out of gambling had failed.
- 12** The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor, or a professional, statutory or other regulatory or government body, in whatever jurisdiction) about the provision of facilities for gambling: a summary of the nature of the concerns must be provided.
- 13** The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
- 14** The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
- 15** The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique

reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

### **Gambling facilities**

- 16** Any security breach to the licensee's environment that adversely affects the confidentiality of customer data; or prevents the licensee's customers, staff, or legitimate users from accessing their accounts for longer than 12 hours.
- 17** Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
- 18** In the case of remote gambling, the commencement or cessation of trading on website domains (*including mobile sites or mobile device applications*) or broadcast media through which the licensee provides gambling facilities (including domains covered by 'white label' arrangements).

In this condition:

'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof

- a** in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
- b** a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

<sup>1</sup> Key events are to be reported to us online via the 'eServices' digital service on our website [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk).

## Licence condition 15.2.2

### Other reportable events

#### All operating licences

- 1 Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable of the occurrence of any of the following events<sup>1</sup>:
  - a any material change in the licensee's arrangements for the protection of customer funds in accordance with licence condition 4 (where applicable).
  - b any change in the identity of the Alternative Dispute Resolution entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
  - c their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised, or their becoming aware of a sustained or meaningful generation of the 3% or 10% of group Gross Gambling Yield being exceeded by the group in that jurisdiction.
  - d any actual or potential breaches by the licensee of the requirements imposed by or under Parts 7 or 8 of the Proceeds of Crime Act 2002, or Part III of the Terrorism Act 2000, or any UK law by which those statutes are amended or superseded.

In this condition:

- a 'group company' has the same meaning as in condition 15.2.1; and
- b without prejudice to section 327 of the Gambling Act 2005, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

<sup>1</sup> Other reportable events are to be reported to us online via the 'eServices' digital service on our website [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

### **Licence condition 15.2.3**

#### **Other reportable events – money laundering, terrorist financing, etc All non-remote and remote casino operating licences**

- 1** Licensees must notify the Commission in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable of any actual or potential breaches by the licensee of the provisions of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on Payer) Regulations 2017, or any UK Statutory Instrument by which those regulations are amended or superseded.
- 2** Licensees must, within 14 days of the appointment, notify the Commission of the identity of the individual appointed as:
  - a** the officer responsible for the licensee's compliance with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on Payer) Regulations 2017 (regulation 21(1)(a)),
  - b** the nominated officer (regulation 21(3)),and any subsequent appointment to either of those positions.
- 3** Licensees must, within 14 days of the departure or removal of any individual appointed to the positions mentioned in 2 above, notify the Commission of such departure or removal.

Other reportable events are to be reported to us online via the 'eServices' digital service on our website [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

## **15.3 General and regulatory returns**

### **Licence condition 15.3.1**

#### **General and regulatory returns All operating licences**

- 1** On request, licensees must provide the Commission with such information as the Commission may require, in such a form or manner as the Commission may from time-to-time specify, about the use made of facilities provided in accordance with this licence and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on.
- 2** In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit an accurate Regulatory Return to the Commission containing such information as the Commission may from time to time specify<sup>1</sup>.

<sup>1</sup>Regulatory returns are to be submitted to us online via the 'eServices' digital service on our website [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)



## 16 Responsible placement of digital adverts

## 16 Responsible placement of digital adverts

### 16.1 Responsible placement of digital adverts

#### Licence condition 16.1.1

##### Responsible placement of digital adverts

##### All licences

#### 1 Licences must:

- a Ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
- b take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
- c ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

## 17 Customer identity verification

### 17.1 Customer identity verification

#### Licence condition 17.1.1

##### Customer identity verification

**All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except any lottery licence the holder of which only provides facilities for participation in low frequency<sup>1</sup> or subscription lotteries, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo.**

- 1 Licensees must obtain and verify information in order to establish the identity of a customer before that customer is permitted to gamble. Information must include, but is not restricted to, the customer's name, address and date of birth.
- 2 A request made by a customer to withdraw funds from their account must not result in a requirement for additional information to be supplied as a condition of withdrawal if the licensee could have reasonably requested that information earlier. This requirement does not prevent a licensee from seeking information on the customer which they must obtain at that time due to any other legal obligation.
- 3 Before permitting a customer to deposit funds, licensees should inform customers what types of identity documents or other information the licensee may need the customer to provide, the circumstances in which such information might be required, and the form and manner in which such information should be provided.
- 4 Licensees must take reasonable steps to ensure that the information they hold on a customer's identity remains accurate.

<sup>1</sup> A 'low frequency lottery' is one of a series of separate lotteries promoted on behalf of the same non-commercial society or local authority, or as part of the same multiple society lottery scheme, in respect of which there is a period of at least two days between each lottery draw.

## Part II: Code of practice

### Introduction

This is the Commission's principal code of practice, issued under section 24 of the Gambling Act 2005.

There are two types of code provisions in this document:

- social responsibility code provisions: compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution; these provisions are set out in shaded boxes
- ordinary code provisions: these do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner. Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty; these code provisions are in the unshaded boxes in this section.

## Code provisions

### 1 General

#### 1.1 Cooperation and responsibility for third parties

##### Ordinary Code Provision 1.1.1

##### Cooperation with the Commission

##### All licences

- 1 As made plain in its *Statement of principles for licensing and regulation*, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

##### Social responsibility code provision 1.1.2

##### Responsibility for third parties – all licences

##### All licences

- 1 Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
- 2 Licensees must ensure that the terms on which they contract with such third parties:
  - a require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
  - b oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
  - c enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.



### **Social responsibility code provision 1.1.3**

#### **Responsibility for third parties - remote**

##### **All remote licences**

- 1** Remote licensees must ensure in particular:
  - a** that third parties who provide user interfaces enabling customers to access their remote gambling facilities:
    - i** include a term that any such user interface complies with the Commission's technical standards for remote gambling systems; and
    - ii** enable them, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of that term.

## **2 Financial requirements**

### **2.1 Anti-money laundering**

#### **Ordinary code provision 2.1.1**

##### **Anti-money laundering - casino**

##### **All remote and non-remote casino licences**

- 1** In order to help prevent activities related to money laundering and terrorist financing, licensees should act in accordance with the Commission's guidance on anti-money laundering, *The Prevention of Money Laundering and Combating the Financing of Terrorism - Guidance for remote and non-remote casinos*.

#### **Ordinary code provision 2.1.2**

##### **Anti-money laundering – other than casino**

##### **All licences except casino licences**

- 1** As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators)*.



## 3 Protection of children and other vulnerable persons

### 3.1 Combating problem gambling

#### **Social responsibility code provision 3.1.1**

#### **Combating problem gambling**

#### **All licences**

- 1 Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.
- 2 Licensees must make an annual financial contribution to one or more organisation(s) which are approved by the Gambling Commission, and which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling.

## 3.2 Access to gambling by children and young persons

### **Social responsibility code provision 3.2.1**

#### **Access to gambling by children and young persons – casinos SR code**

##### **All non-remote casino licences**

- 1** Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2** Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
- 3** Licensees must designate one or more supervisors for each casino entrance.
- 4** A supervisor's responsibilities include ensuring compliance with this section of the code.
- 5** A supervisor must implement the following procedures:
  - a** checking the age of customers who appear to be, or are suspected of being, underage
  - b** refusing entry to anyone unable to produce an acceptable form of identification, ie one which:
    - i** contains a photograph from which the individual can be identified
    - ii** states the individual's date of birth
    - iii** is valid
    - iv** is legible and shows no signs of tampering or reproduction
  - c** taking action when there are unlawful attempts to enter the premises, including removing anyone who appears to be underage and cannot produce an acceptable form of identification.
- 6** Licensees must not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.
- 7** In premises restricted to adults, service must be refused in any circumstances where any adult is accompanied by a child or young person.
- 8** Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and the legal requirements on returning stakes and not paying prizes to underage customers.
- 9** Licensees must conduct test purchasing or take part in collective test purchasing programmes as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

### Ordinary code provision 3.2.2

#### Access to gambling by children and young persons – casinos ordinary code

##### All non-remote casino licences

- 1 There should be a sufficient number of supervisors at casino entrances to enable a considered judgement to be made about the age of everyone attempting to enter the casino and to take the appropriate action (for example checking identification) whilst at the same time not allowing others to enter unsupervised. The nature of this task means that it cannot be properly accomplished only by using CCTV; it will require a physical presence. Heavily used entrances may require more than one designated supervisor.
- 2 Supervisors may be assisted by other door keepers provided the supervisor retains the responsibility for compliance with this section of the code and deals personally with any case where there is any doubt or dispute as to someone's eligibility to enter.
- 3 The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including provisional licence) with photocard; or a passport.
- 4 Licensees should put into effect procedures that require their staff to check the age of any customer who appears to them to be under 21.
- 5 Licensees should consider permanent exclusion from premises of any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.
- 6 Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission<sup>1</sup> and the police, and making available information on problem gambling.
- 7 In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

<sup>1</sup>These matters are to be reported to us online via our 'eServices' digital service on our website [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)



### **Social responsibility code provision 3.2.3**

#### **Access to gambling by children and young persons – AGC SR code**

##### **All adult gaming centre licences**

- 1** Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2** This must include procedures for:
  - a** checking the age of apparently underage customers
  - b** removing anyone who appears to be under age and cannot produce an acceptable form of identification
  - c** taking action when there are attempts by under-18s to enter the premises.
- 3** Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
- 4** Licensees must not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.
- 5** In premises restricted to adults, service must be refused in any circumstances where any adult is accompanied by a child or young person.
- 6** Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and the legal requirements on returning stakes and not paying prizes to underage customers.
- 7** Licensees must only accept identification which:
  - a** contains a photograph from which the individual can be identified
  - b** states the individual's date of birth
  - c** is valid
  - d** is legible and has no visible signs of tampering or reproduction.
- 8** Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.



#### **Ordinary code provision 3.2.4**

#### **Access to gambling by children and young persons – AGC ordinary code**

#### **All adult gaming centre licences**

- 1** The Commission considers acceptable forms of identification to include any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
- 2** Licensees should put into effect procedures that require their staff to check the age of any customer who appears to them to be under 21.
- 3** Licensees should consider permanent exclusion from premises for any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.
- 4** Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission<sup>1</sup> and the police, and making available information on problem gambling.
- 5** Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
- 6** In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

<sup>1</sup>These matters are to be reported to us online via our 'eServices' digital service on our website [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

### **Social responsibility code provision 3.2.5**

#### **Access to gambling by children and young persons – bingo and FEC SR code**

#### **All non-remote bingo and family entertainment centre licences**

- 1** Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2** This must include procedures for:
  - a** checking the age of apparently underage customers
  - b** refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
  - c** taking action when there are unlawful attempts to enter the adult-only areas.
- 3** Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
- 4** Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
- 5** Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
  - a** all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
  - b** the legal requirements on returning stakes and not paying prizes to underage customers; and
  - c** procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
- 6** Licensees must only accept identification which:
  - a** contains a photograph from which the individual can be identified
  - b** states the individual's date of birth
  - c** is valid
  - d** is legible and has no visible signs of tampering or reproduction.
- 7** Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

### **Ordinary code provision 3.2.6**

#### **Access to gambling by children and young persons – bingo and FEC ordinary code All non-remote bingo and family entertainment centre licences**

- 1** The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
- 2** Licensees should require a person who appears to relevant staff to be under the age of 21 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
- 3** Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
- 4** Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission<sup>1</sup> and the police, and making available information on problem gambling to the child or young person concerned.
- 5** Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
- 6** Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
- 7** In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

<sup>1</sup>These matters are to be reported to us online via our 'eServices' digital service on our website [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)



### **Social responsibility code provision 3.2.7**

#### **Access to gambling by children and young persons – betting SR code**

**Paragraphs 1, 2 and 4-7: all non-remote betting and remote betting intermediary (trading rooms only) licences**

**Paragraph 3: all non-remote betting licences (except general betting (limited) licences) and remote betting intermediary (trading rooms only) licences**

**Paragraph 8: non-remote pool betting licences**

**Paragraph 9: non-remote general betting (standard) licences in fee category C or above**

- 1 Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2 This must include procedures for:
  - a checking the age of apparently underage customers
  - b removing from adult-only licensed premises anyone who appears to be underage and cannot produce an acceptable form of identification
  - c taking action when there are attempts by under-18s to enter adult-only premises
  - d refusing entry to any adult-only area of a track to anyone unable to produce an acceptable form of identification
  - e taking action when there are unlawful attempts to enter the adult-only areas.
- 3 Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises
- 4 Licensees must not deliberately provide facilities for gambling in such a way as to appeal particularly to children or, except in the case of football pools, young people, for example by reflecting or being associated with youth culture.
- 5 In premises restricted to adults, service must be refused in any circumstances where any adult is accompanied by a child or young person.
- 6 Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and the legal requirements on returning stakes and not paying prizes to underage customers.
- 7 Licensees must only accept identification which:
  - a contains a photograph from which the individual can be identified
  - b states the individual's date of birth
  - c is valid
  - d is legible and has no visible signs of tampering or reproduction.
- 8 In the case of non-remote pool betting licensees, where pool entries or payments are collected door to door by the licensee or the licensee's authorised agent the licensee's procedures must include procedures for:
  - a checking the age of apparently underage entrants to the pool; and
  - b taking action when there are unlawful attempts to enter the pool.
- 9 Licensees must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.



### **Ordinary code provision 3.2.8**

**Access to gambling by children and young persons – betting ordinary code Paragraphs 1 to 5 inclusive: all non-remote betting and remote betting intermediary (trading rooms only) licences**

**Paragraph 6: all non-remote betting licences (except non-remote general betting (standard) licences in fee category C or above) and remote betting intermediary (trading rooms only) licences**

- 1** The Commission considers acceptable forms of identification to include any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
- 2** Licensees should put into effect procedures that require their staff to check the age of any customer who appears to them to be under 21.
- 3** Licensees should consider permanent exclusion from premises for any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.
- 4** Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission<sup>1</sup> and the police, and making available information on problem gambling.
- 5** In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.
- 6** Licensees should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.

<sup>1</sup>These matters are to be reported to us online via our 'eServices' digital service on our website [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

### **Social responsibility code provision 3.2.9**

**Access to gambling by children and young persons – lottery SR code**

**All non-remote lottery licences**

- 1** Licensees must have and put into effect policies and procedures designed to minimise the risk of lottery tickets being sold to children (that is, persons under 16). This must include procedures for:
  - a** checking the age of apparently underage purchasers of lottery tickets
  - b** taking action when there are unlawful attempts to purchase tickets.
- 2** Licensees must take all reasonable steps to ensure that all those engaged in the promotion of lotteries in reliance on the licence understand their responsibilities for preventing underage gambling, returning stakes and not paying prizes to underage customers.

### **Ordinary code provision 3.2.10**

**Access to gambling by children and young persons – lottery ordinary code**

**All non-remote lottery licences**

- 1** Licensees should require a person who appears to be under the age of 16 to be asked to produce proof of identity and age before purchasing a ticket.

### **Social responsibility code provision 3.2.11**

#### **Access to gambling by children and young persons – remote SR code**

**All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except lottery licences, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo licences**

- 1** Licensees must have and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these.
- 2** Such procedures must include:
  - a** Verifying the age of a customer before the customer is able to:
    - i** deposit any funds into their account;
    - ii** access any free-to-play versions of gambling games that the licensee may make available; or
    - iii** gamble with the licensee using either their own money or any free bet or bonus.
  - b** warning potential customers that underage gambling is an offence;
  - c** regularly reviewing their age verification systems and implementing all reasonable improvements that may be made as technology advances and as information improves;
  - d** ensuring that relevant staff are properly trained in the use of their age verification procedures; in particular customer services staff must be appropriately trained in the use of secondary forms of identification when initial verification procedures fail to prove that an individual is of legal age; and
  - e** enabling their gambling websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of those sites.

### **Ordinary code provision 3.2.12**

#### **Access to gambling by children and young persons – remote ordinary code**

**All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences**

- 1** Licensees should, and should request their contracted partners to, draw attention to parental responsibility as part of the purchasing process of facilities such as mobile phones and interactive television.



### **Social responsibility code provision 3.2.13**

#### **Access to gambling by children and young persons – remote lottery SR code**

##### **All remote lottery licences**

- 1 Licensees must have and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these.
- 2 Such procedures must include:
  - a warning potential customers that underage gambling is an offence;
  - b requiring customers to affirm that they are of legal age;
  - c regularly reviewing their age verification systems and implementing all reasonable improvements that may be made as technology advances and as information improves;
  - d ensuring that relevant staff are properly trained in the use of their age verification procedures; in particular anyone who sells lottery tickets including canvassers and customer services staff must be appropriately trained in the use of secondary forms of identification when initial verifications procedures fail to prove that an individual is of legal age;
  - e enabling their gambling websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of those sites;
  - f the following age verification procedures:
    - i in the case of both subscription lotteries and low frequency lotteries<sup>1</sup>, and provided it is clear in the terms and conditions that those under the age of 16 are not permitted to participate and that the prizes will not be paid out to those found to be under 16, customers must be required to verify their age before being able to make any subscription or purchase entry into the lottery. (The licensee is expected to conduct a programme of random checks of users who self-verify for compliance with age restrictions);
    - ii in every other case, licensees must verify the age of a customer before the customer is able to:
      - o access any free-to-play versions of lotteries (for example instant win or digital scratchcard lotteries) that the licensee may make available; or
      - o in any case, participate in a lottery.

<sup>1</sup>A 'low frequency lottery' is one of a series of separate lotteries promoted on behalf of the same non-commercial society or local authority, or as part of the same multiple society lottery scheme, in respect of which there is a period of at least two days between each lottery draw

### **Ordinary code provision 3.2.14**

#### **Access to gambling by children and young persons – remote lottery ordinary code**

##### **All remote society lottery licences**

- 1 Where operators consider the lottery will be more likely to attract underage play – eg where the prize is of particular appeal to children (those under the age of 16) such as concert tickets, games consoles, large prizes - operators should ensure that age verification measures are appropriate to the risk of attempted underage play. In these circumstances it is unlikely that self-verification alone will be sufficient.



### 3.3 Gambling management tools and responsible gambling management information

#### **Social responsibility code provision 3.3.1**

##### **Responsible gambling information**

**All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences**

- 1 Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
- 2 The information must cover:
  - a any measures provided by the licensee 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
  - b timers or other forms of reminders or 'reality checks' where available
  - c self-exclusion options
  - d information about the availability of further help or advice.
- 3 The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
- 4 For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

#### **Ordinary code provision 3.3.2**

##### **Responsible gambling information – foreign languages**

**All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences**

- 1 Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
  - a the information on how to gamble responsibly and access to help referred to above
  - b the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
  - c the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.



**Social responsibility code provision 3.3.3**  
**Betting B2 - time and monetary thresholds**  
**All non-remote betting licences**

- 1 Licensees must ensure that any B2 machines that they make available for use require customers to make an active choice whether to set time and monetary thresholds for customer and staff alerts. Such thresholds must comply with any relevant requirements set out in the Commission's machine technical standards.

**Social responsibility code provision 3.3.4**  
**Remote time-out facility**

**All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting licences, remote betting (remote platform), gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading room only) licences**

- 1 Licensees must offer a 'time out' facility for customers for the following durations:
  - a 24 hours
  - b one week
  - c one month or
  - d such other period as the customer may reasonably request, up to a maximum of 6 weeks.

## 3.4 Customer interaction

### **Social responsibility code provision 3.4.1**

#### **Customer interaction**

**All licences, except non-remote lottery, gaming machine technical, gambling software and host licences**

- 1** Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
  - a** identifying customers who may be at risk of or experiencing harms associated with gambling.
  - b** interacting with customers who may be at risk of or experiencing harms associated with gambling.
  - c** understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
- 2** Licensees must take into account the Commission's guidance on customer interaction.

### **Social responsibility code provision 3.4.2**

#### **Customer interaction – lotteries**

**All lottery licences**

- 1** Licensees who are non-commercial societies or external lottery managers must:
  - a** set an upper limit on the value of lottery tickets which may be sold to a person, whether as part of a single transaction or over a period of time, without customer interaction;
  - b** maintain records of all instances of customer interaction pursuant to (a) above and, in each case, whether purchase of tickets beyond the limits set was then permitted; and
  - c** ensure such records are made available to the Commission for inspection on request and retained for at least three years from the date of any lottery to which they relate.



## 3.5 Self-exclusion

### **Social responsibility code provision 3.5.1**

#### **Self-exclusion – non-remote and trading rooms SR code**

#### **All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences**

- 1** Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
- 2** Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
- 3** Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
- 4** This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
- 5** Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
- 6** Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
  - a** a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
  - b** photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
  - c** staff training to ensure that staff are able to administer effectively the systems; and
  - d** the removal of those persons found in the gambling area or attempting to gamble from the premises.
- 7** Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.
- 8** Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.



### **Ordinary code provision 3.5.2**

#### **Self-exclusion – non-remote ordinary code**

#### **All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences**

- 1** Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
- 2** Individuals should be able to self-exclude without having to enter gambling premises.
- 3** Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
- 4** Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
- 5** Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
- 6** Customers should be given the opportunity to discuss self-exclusion in private, where possible.
- 7** Licensees should take steps to ensure that:
  - a** the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
  - b** any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
  - c** a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
  - d** at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
  - e** where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
  - f** notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
- 8** The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
- 9** Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
- 10** Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.



- 11 Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
- 12 In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

### **Social responsibility code 3.5.3**

#### **Self-exclusion – remote SR code**

**All remote licences except: gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, betting intermediary (trading room only) and remote betting (standard) (remote platform) licences**

**Paragraph 8 does not apply to ancillary remote betting licences, remote general betting (limited), or any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries**

- 1 Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
- 2 Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
- 3 Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
- 4 This covers any marketing material relating to gambling. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
- 5 Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
- 6 Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
  - a a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
  - b a record of the card numbers to be excluded;
  - c staff training to ensure that staff are able to administer effectively the systems; and
  - d the removal of access from those persons found to have gambled or who have attempted to gamble on the facilities.
- 7 Licensees must when administering the self-exclusion signpost the individual to counselling and support services.
- 8 Customers must be given the opportunity to self-exclude by contacting customer services and in addition by entering an automated process using remote communication. In order to avoid inadvertent self-exclusion it is acceptable for an automated process to include an additional step that requires the customer to confirm that they wish to self-exclude. The licensee must ensure that all staff who are involved in direct customer service are aware of the self-exclusion system in place, and are able to direct that individual to an immediate point of contact with whom/which to complete that process.



#### Ordinary code provision 3.5.4

##### Self-exclusion – remote ordinary code

**All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, remote betting intermediary (trading rooms only) and remote betting (standard) (remote platform) licences**

- 1 Self-exclusion procedures should require individuals to take positive action in order to self-exclude:
  - a over the **internet**; this can be a box that must be ticked in order to indicate that they understand the system
  - b by **telephone**; this can be a direct question asking whether they understand the system.
- 2 Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
- 3 Licensees should encourage the customer to consider extending their self-exclusion to other remote gambling operators currently used by the customer.
- 4 Within the licensee's information about self-exclusion policies, the licensee should provide a statement to explain that software is available to prevent an individual computer from accessing gambling internet sites. The licensee should provide a link to a site where further information is available.
- 5 Licensees should take all reasonable steps to ensure that:
  - a the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months;
  - b any self-exclusion may, on request, be extended for one or more further periods of at least 6 months;
  - c the self-exclusion arrangements give customers the option of selecting a self-exclusion period of up to at least five years;
  - d a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups) the customer may return at a later date to enter into self-exclusion;
  - e at the end of the period chosen by the customer, self-exclusion remains in place, for a minimum of 7 years, unless the customer takes positive action to gamble again;
  - f where a customer chooses not to renew, and makes a positive request to begin gambling again, during the 7 year period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed to access gambling facilities. Contact must be made via phone or in person; re-registering online is not sufficient; and
  - g notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
- 6 The licensee should retain the records relating to a self-exclusion agreement for as long as is needed to enable the self-exclusion procedures set out in paragraph 5 above to be implemented.
- 7 Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
- 8 In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

**Social responsibility code provision 3.5.5**

**Self-exclusion – remote multi-operator SR code**

**All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting, remote general betting (remote platform), remote betting intermediary (trading room only), remote general betting (limited), gaming machine technical, gambling software, host, ancillary remote bingo, and ancillary remote casino licences**

- 1 Licensees must participate in the national multi-operator self-exclusion scheme.

**Social responsibility code provision 3.5.6**

**Self-exclusion – multi-operator non-remote SR code**

**All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres**

- 1 Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

**Ordinary code provision 3.5.7**

**Self-exclusion – multi-operator non-remote ordinary code**

**All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres**

- 1 Licensees should contribute to and participate in the development and effective implementation of multi-operator self-exclusions schemes with the aim of making available to customers the ability to self-exclude from facilities for gambling provided by other licensed operators within their local area(s).



**Social responsibility code provision 3.5.8**  
**Self-exclusion – non-remote lottery SR code**  
**All non-remote lottery licences**

- 1 Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
- 2 Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
- 3 Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
- 4 This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
- 5 Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
- 6 Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
  - a a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
  - b a facility for someone self-excluding to provide a signature; and
  - c staff training to ensure that staff are able to administer effectively the systems.
- 7 Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

### 3.6 Employment of children and young persons

#### Ordinary code provision 3.6.1

##### Employment of children and young people – lottery and pool betting

##### All lottery licences and pool betting licences restricted to football pools

- 1 Licensees who employ young persons (16 and 17 year olds) to sell tickets, collect payments or pay out winnings should have and put into effect policies and procedures designed to ensure that all staff, including staff who are young persons themselves, are made aware that the law prohibits underage gambling, and that tickets may only be sold to persons aged 16 or over.

#### Ordinary code provision 3.6.2

##### Employment of children and young people – bingo

##### All non-remote bingo licences

- 1 Licensees who employ children under (under-16-year-olds) and young persons (those aged 16 or 17) should be aware that it is an offence:
  - a to employ them to provide facilities for playing bingo;
  - b for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine; and
  - c to employ a child to perform any function on premises where, and at time when, facilities are being provided for playing bingo.
- 2 As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3 Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
  - a children and young persons are never asked to perform tasks within 1a or 1b, above
  - b all staff, including those who are children and young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4 Licensees should consider adopting a policy that:
  - a children are not employed to work on bingo licensed premises at any time when the premises are open for business
  - b neither children nor young persons are in any event asked to work in areas where gaming machines are situated.



### Ordinary code provision 3.6.3

#### Employment of children and young people – casino

##### All non-remote casino licences

- 1** Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
  - a** to employ them to provide facilities for gambling;
  - b** if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time; and
  - c** to employ them to carry out any other function on casino licensed premises while any gambling activity is being carried on in reliance on the premises licence (except that they can be employed on a part of regional casino premises when that part of the premises is not being used for the provision of facilities for gambling).
- 2** As to **1b**, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3** Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
  - a** children and young persons are never asked to perform tasks within 1a or 1b above
  - b** all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4** Licensees should consider adopting a policy that:
  - a** children and young persons are not employed to work on casino licensed premises (other than in an area of a regional casino where gambling does not take place) at any time when the premises are open for business
  - b** gaming machines are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

#### Ordinary code provision 3.6.4

##### Employment of children and young people – betting

##### All non-remote general, pool betting, and remote betting intermediary (trading rooms only) licences

- 1 Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
  - a to employ children to provide facilities for gambling in connection with football pools;
  - b otherwise to employ children and young persons to provide facilities for gambling;
  - c if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time; and
  - d to employ them to carry out any other function on betting licensed premises while any gambling activity is being carried on in reliance on the premises licence.
- 2 As to 1c, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3 Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
  - a children are never asked to perform tasks within 1a above
  - b children and young persons are never asked to perform tasks within 1b above
  - c all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4 Licensees should consider adopting a policy that:
  - a children and young persons are not employed to work on betting licensed premises at any time when the premises are open for business
  - b gaming machines are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

#### Ordinary code provision 3.6.5

##### Employment of children and young people – AGCs

##### All adult gaming centre licences

- 1 Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
  - a to employ them to provide facilities for gambling;
  - b if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time; and
  - c to employ them to carry out any other function on adult gaming centre licensed premises while any gambling activity is being carried on in reliance on the premises licence.
- 2 As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3 Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
  - a children and young persons are never asked to perform tasks within 1a or 1b, above
  - b all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4 Licensees should consider adopting a policy that:
  - a children and young persons are not employed to work on adult gaming centre licensed premises at any time when the premises are open for business
  - b gaming machines are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.



#### **Ordinary code provision 3.6.6**

##### **Employment of children and young people – FECs**

##### **All family entertainment centre licences**

- 1** Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
  - a** to employ them to provide facilities for gambling; and
  - b** if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time.
- 2** As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3** Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
  - a** children and young persons are never asked to perform tasks within 1a or 1b, above; and
  - b** all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4** Licensees should consider adopting a policy that:
  - a** children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place; and
  - b** gaming machines sited in adult-only areas are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

#### **Ordinary code provision 3.6.7**

##### **Employment of children and young people – remote**

##### **All remote licences, except remote lottery, remote pool betting, remote gaming machine technical, remote gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences**

- 1** Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence to employ them to provide facilities for gambling.

#### **Ordinary code provision 3.6.8**

##### **Employment of children and young people – remote pool betting**

##### **All remote pool betting licences**

- 1** Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
  - a** to employ children to provide facilities for gambling on connection with football pools; and
  - b** otherwise to employ children and young people to provide facilities for gambling.

## 3.7 Provision of credit

### Social responsibility code provision 3.7.1

#### Provision of credit

**All non-remote general betting licences (except where betting is offered under a 2005 Act casino premises licence), pool betting licences and all remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote casino, ancillary remote bingo and remote betting intermediary (trading rooms only) licences**

- 1** Licensees who choose to offer credit to members of the public who are not themselves gambling operators must also:
  - a** have procedures for checking and scoring applications for credit from such customers, for setting, and for the increase of, credit limits
  - b** explain these procedures to customers
  - c** set a maximum credit limit for each customer and not permit customers to exceed that limit without further application
  - d** apply a 24-hour delay between receiving a request for an increase in a credit limit and granting it in those cases where the limit exceeds that which the operator previously set
  - e** not require a minimum spend within a set time period
  - f** take all reasonable steps to ensure that offers of credit are not sent to vulnerable persons, including those who have self-excluded from gambling
  - g** ensure that information about an offer of credit includes a risk warning of what may happen in the event of default.

## 3.8 Money lending between customers

### Ordinary code provision 3.8.1

#### Money-lending - casinos

#### All non-remote casino licences

- 1** Licensees should take steps to prevent systematic or organised money lending between customers on their premises.
- 2** While the nature of those steps will depend to some extent on the layout and size of the premises, they should cover matters such as:
  - a** systems for monitoring for such activity;
  - b** instructions to staff concerning what they should do if they spot what they believe to be significant money lending and to managers about the ways in which they should handle and act on any such lending; and
  - c** excluding from the premises, either temporarily or permanently as appropriate, any person whom the evidence suggests has become involved in organised or systematic money lending.
- 3** There should be appropriate arrangements in place to cover any cases where it appears that the lending may be commercial in nature or may involve money laundering. In the latter case, the requirements in respect of reporting suspicious transactions must be followed. In all cases where the operator encounters systematic or organised money lending, a report should be made to the Commission.<sup>1</sup>

<sup>1</sup>These matters are to be reported to us online via our 'eServices' digital service on our website [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)



#### **Ordinary code provision 3.8.2**

##### **Money-lending – other than casinos**

##### **All non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences**

- 1** Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

### **3.9 Identification of individual customers**

#### **Social responsibility code 3.9.1**

##### **Identification of individual customers - remote**

##### **All remote licences (including ancillary remote betting licences)**

##### **except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences**

- 1** Licensees must have and put into effect policies and procedures designed to identify separate accounts which are held by the same individual.
- 2** Where licensees allow customers to hold more than one account with them, the licensee must have and put into effect procedures which enable them to relate each of a customer's such accounts to each of the others and ensure that:
  - a** if a customer opts to self-exclude they are effectively excluded from all gambling with the licensee unless they make it clear that their request relates only to some forms of gambling or gambling using only some of the accounts they hold with the licensee;
  - b** all of a customer's accounts are monitored and decisions that trigger customer interaction are based on the observed behaviour and transactions across all the accounts;
  - c** where credit is offered or allowed the maximum credit limit is applied on an aggregate basis across all accounts; and
  - d** individual financial limits can be implemented across all of a customer's accounts.
- 3** Licensees which are companies or other bodies corporate must take all reasonable steps to comply with the above provision as if reference to a customer holding more than one account with them included a reference to a customer holding one or more accounts with them and one or more accounts with a group company.
- 4** A company is a 'group company' in relation to a licensee if it is the holding company of, subsidiary of, or shares a common holding company with, the licensee. For these purposes 'holding company' and 'subsidiary' have the meanings ascribed to them by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof.



## 4 'Fair and open' provisions

### 4.1 Fair terms

#### **Social responsibility code provision 4.1.1**

##### **Fair terms**

##### **All licences, except gaming machine technical and gambling software licences**

- 1 Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

### 4.2 Display of rules and supervision of games

#### **Social responsibility code provision 4.2.1**

##### **Display of rules - casino**

##### **All non-remote casino licences**

- 1 In complying with any condition on a casino premises licence requiring the display of rules about gaming, licensees must ensure that the following are included:
  - a the rules of each type of casino game available to be played
  - b a player's guide to the house edge
  - c a player's guide to the rules of any equal chance games which are made available.

#### **Social responsibility code provision 4.2.2**

##### **Display of rules - bingo**

##### **All non-remote bingo licences**

- 1 In complying with any condition on a bingo premises licence or a 2005 Act large casino premises licence requiring the display of rules about gaming, licensees must ensure that the following are included:
  - a rules about each variant of bingo made available; and
  - b rules about any prize gaming made available.

#### **Social responsibility code provision 4.2.3**

##### **Display of rules – remote SR code**

##### **All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences**

- 1 Licensees must make the following available to customers:
  - a a player's guide to each gambling opportunity (bet, game or lottery) made available by the operator; and
  - b such additional information relating to the available gambling as the Commission shall from time to time publish to licensees: the current requirements are set out in the Commission's *Remote gambling and software technical standards*.



#### **Ordinary code provision 4.2.4**

##### **Display of rules - remote ordinary code**

**All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences**

- 1** Where practicable, the player's guide and additional information referred to in the social responsibility code [4.2.3](#) should be made available through the medium in which the remote gambling is to be conducted. Where that is not practicable, licensees should either:
  - a** send a copy of the guide and required additional information by post, fax or email; or
  - b** make these available to the customer in another medium to which he has access.

#### **Social responsibility code provision 4.2.5**

##### **Supervision of games**

**All non-remote casino licences**

- 1** Licensees must have and put into effect policies and procedures designed to ensure that proper supervision of gaming at tables is carried out by supervisors, pit bosses and croupiers in order to ensure the integrity of the gaming is not compromised. Such policies and procedures must take into account, but need not be limited by, any mandatory premises licence conditions relating to the layout of premises.

#### **Social responsibility code provision 4.2.6**

##### **Display of rules – betting**

**All general betting and betting intermediary licences, except remote betting intermediary (trading rooms only) licences**

- 1** Licensees must set out within the full rules that they make available, the core elements for the acceptance and settlement of bets. These rules must cover:
  - a** the circumstances under which the operator will void a bet;
  - b** treatment of errors, late bets and related contingencies;
  - c** availability of odds for any ante-post, early show or starting price betting, and treatment of place, forecast bets etc;
  - d** treatment of withdrawals, non-runners, and reformed markets;
  - e** maximum payout limiting liability for a specific betting product or generally;
  - f** any charges made to customers for the use of betting services or products, and how these are calculated (including deductions from winnings for commission, or in respect of withdrawn horses etc);
  - g** means or medium by which the outcome of an event will be determined;
  - h** the rules for the event itself to be specified (eg horserace bets only to be accepted; where the racing is subject to British Horseracing Authority rules);
  - i** where bets are accepted on 'pari-mutuel' terms; and
  - j** any special arrangements for settling bets on 'coupled' horses.
- 2** Where special rules have been agreed in relation to a particular bet these must not be overridden by any conflicting rules or subsequent rule changes.
- 3** Licensees must issue a betting slip or an electronic acknowledgement (other than in the case of telephone betting) for each transaction which includes information as to the operator's name and contact details, and words equivalent to 'Bets are accepted in accordance with the operator's rules'.



## **Social responsibility code 4.2.7**

### **Display of rules – on-course betting**

#### **All non-remote general betting licences**

- 1** When providing facilities for betting on-course, licensees must display on their 'joints' in an intelligible format:
  - a** any rules that differ from the relevant racecourse rules on betting, such as Tattersalls' 'Rules on Betting'<sup>1</sup>;
  - b** any types of unorthodox bets accepted (such as forecast betting, betting without the favourite, distance betting etc);
  - c** whether win-only or each way bets are accepted;
  - d** any concessions or bonuses offered;
  - e** all of the runners and the odds available to the public;
  - f** the operator's trading name;
  - g** the minimum bet accepted; and
  - h** any applicable maximum payout.
- 2** Licensees operating within the ring at horserace tracks<sup>2</sup> must issue customers with a betting slip or ticket for each transaction accepted. Betting slips or tickets must include the following information:
  - a** operator's name and contact details;
  - b** race day name or code, date and race number;
  - c** name and/or number of the selection;
  - d** the stake, odds and potential return or whether the bet will be settled according to Starting Price; and
  - e** the type of bet.
- 3** Any special rules which have been agreed in relation to a particular bet must not be overridden by any conflicting rules or subsequent rule changes.

<sup>1</sup> The references to Tattersalls' 'Rules on Betting' reflect the current position and may need to be amended in future

<sup>2</sup> Licensees operating under the provision of an occasional use notice (eg point-to-points) must ensure ledger systems are capable of providing the information listed here.

## **Ordinary code provision 4.2.8**

### **Betting integrity**

#### **All betting operating licences, including betting intermediary, ancillary remote betting and remote betting intermediary (trading rooms only) licences**

- 1** Where licensees offer to accept bets, or facilitate the making or acceptance of bets between others, on the outcome of a sport regulated by a sport governing body for the time being included in Part 3 of Schedule 6 of the Act, they should take all reasonable steps to familiarise themselves with the rules applied by that body on betting, in particular betting by registered participants.
- 2** Licensees should ensure that a condition of their accepting bets is that for a bet to be valid, customers placing such bets must not be in breach of any rules on betting or misuse of inside information relevant to a sports governing body, other professional body of which they are a member, or their employers. Where a breach of these rules is identified, licensees should then take steps to void the bet.



#### **Social responsibility code provision 4.2.9**

##### **Display of rules – pool betting**

###### **All pool betting licences**

- 1** Licensees or any person they authorise to offer pool betting on their behalf under authority of section 93 of the Act must publish their rules relevant to the following:
  - a** the deduction levels for overheads, taxes, profits etc, expressed as a percentage, from each available pool;
  - b** the rounding of winning dividends to a whole unit;
  - c** the procedure for when there is no winner of the pool, and the circumstances in which the pool is carried over; and
  - d** the period of time in which a winning bet may be claimed from the pool operator.

#### **Social responsibility code provision 4.2.10**

##### **Pool betting**

###### **All non-remote pool betting licences**

- 1** Licensees or any person they authorise to offer pool betting on their behalf under authority of section 93 of the Act, must only accept bets through equipment capable of communicating bets to a central recording system.
- 2** The equipment must supply the person placing the bet with a betting slip or ticket containing the following information:
  - a** the date on which the bet is made;
  - b** the amount of the stake;
  - c** the identity of the track, the number or time of the race and the pool in respect of which the bet is made;
  - d** the selection or selections or combination of selections as indicated; and
  - e** means of identifying the equipment recording the bet.
- 3** The central recording system must collect all bets made to each of the operator's pools and all information required to calculate the winnings of each pool and be capable of storing this information for subsequent retrieval if required by the Commission.
- 4** Licensees and any person they authorise to offer pool betting on their behalf under authority of section 93 of the Act must:
  - a** provide a public display system within sight of all of the operator's terminals capable of accepting pool bets situated on-course. The system must display the potential dividend returns in respect of win and place outcomes from each pool operated, and in at least one place the units staked on all types of combination bets offered. This information is to be updated whilst the pool market is open. Following conclusion of the event to which the pool relates, the total amount payable as winning dividends must be displayed as soon as practicable; and
  - b** display prominently the minimum stake that will be accepted as a bet.



## 4.3 Additional consumer information

### **Social responsibility code provision 4.3.1**

#### **Publication of percentage of lottery proceeds returned to the purposes of the society or local authority**

##### **All lottery operating licences issued to non-commercial societies and local authorities**

- 1 Each year, licensees must publish details on the percentage of the total proceeds of lotteries promoted in the previous calendar year in reliance on this licence applied to purposes for which the society is conducted, or purposes for which the local authority has power to incur expenditure. This should be through either their annual report, lottery page of their society website or any other means appropriate to the size and scale of the organisation.

### **Social responsibility code provision 4.3.2**

#### **Marketing of all lotteries conducted under a single brand (branded lotteries)**

##### **All lottery operating licences issued to non-commercial societies, local authorities and external lottery managers**

- 1 Where a number of society lotteries are promoted under one brand (also known as a branded lottery<sup>1</sup>), whether with an ELM or not, licensees must ensure that it is clear to consumers (or potential consumers), which society lotteries are being promoted.
- 2 The requirement in (1) must be made clear to consumers within any marketing communications, advertisements, promotions or any information surrounding the draw, winners and beneficiaries; and through any ticket documentation.

<sup>1</sup> a scheme whereby multiple societies promote lotteries under a common brand name or image, either on rotation with other societies or as a regular occurrence for that single society.

### **Social responsibility code provision 4.3.3**

#### **Lotteries – Information to consumers**

##### **All lottery operating licences issued to non-commercial societies, local authorities and external lottery managers**

- 1 Licensees must ensure that clear, transparent, and easily accessible information is made available to consumers to enable them to make an informed choice prior to participating in a lottery. This must include but is not restricted to details of how proceeds are used, the likelihood of winning a prize and how prizes are allocated.
- 2 Licensees must take into account the Commission's guidance on information to lottery players.



## 5 Marketing

### 5.1 Rewards and bonuses

#### **Social responsibility code provision 5.1.1**

##### **Rewards and bonuses – SR code**

**All licences (including ancillary remote licences), except gaming machine technical and gambling software licences**

- 1** If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
  - a** the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
  - b** neither the receipt nor the value or amount of the benefit is:
    - i** dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
    - ii** altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
  - c** if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
  - d** if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.
- 2** If a licensee makes available incentives or reward schemes for customers, designated by the licensee as 'high value, 'VIP' or equivalent, they must be offered in a manner which is consistent with the licensing objectives:

Licensees must take into account the Commission's guidance on high value customer incentives.

#### **Ordinary code provision 5.1.2**

##### **Proportionate rewards**

**All licences (including ancillary remote licences), except gaming machine technical and gambling software licences**

- 1** Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

#### **Social responsibility code provision 5.1.3**

##### **Alcoholic drinks**

**All non-remote bingo and casino licences**

- 1** If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
- 2** Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.



#### **Social responsibility code provision 5.1.4**

##### **Promotion by agents**

##### **All non-remote casino licences**

- 1 Where a licensee employs agents to promote its business (wherever that business is conducted), it must ensure that its agreement with any agent makes clear that the agent must not encourage players to play longer or wager more than the player might otherwise do. In particular, payments should not be directly dependent upon, nor directly calculated by reference to, the length of time for which, or frequency with which, the customer gambles. If the payment to the agent increases with the amount the customer spends it must do so at a rate no greater than that at which the amount spent increases.

#### **Ordinary code provision 5.1.5**

##### **Mailing of lottery tickets**

##### **All lottery licences**

- 1 With a view to minimising the risk of fraud, licensees who are non-commercial societies or external lottery managers should adopt one or more of the following measures:
  - a prohibit the unsolicited mailing of tickets to non-members of the promoting society
  - b limit the value of tickets sent to any one address which is not that of a member of the promoting society to £20
  - c maintain records of tickets distributed and not returned.

#### **Social responsibility code provision 5.1.6**

##### **Compliance with advertising codes**

##### **All licences, except lottery licences**

- 1 All marketing of gambling products and services must be undertaken in a socially responsible manner.
- 2 In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
- 3 The restriction on allowing people who are, or seem to be, under 25 years old (ie: those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

#### **Social responsibility code provision 5.1.7**

##### **Compliance with advertising codes (lotteries)**

##### **All lottery licences**

- 1 All marketing of gambling products and services must be undertaken in a socially responsible manner.
- 2 In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.



**Ordinary code provision 5.1.8**  
**Compliance with industry advertising codes**  
**All licences**

- 1 Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

**Social responsibility code provision 5.1.9**  
**Other marketing requirements**  
**All licences**

- 1 Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
- 2 Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
- 3 The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

**Ordinary code provision 5.1.10**  
**Online marketing in proximity to information on responsible gambling**  
**All licences**

- 1 Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

**Social Responsibility code provision 5.1.11**  
**Direct electronic marketing consent**  
**All licences**

- 1 Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.



## 6 Complaints and disputes

### 6.1 Complaints and disputes

#### **Social responsibility code provision 6.1.1**

##### **Complaints and disputes**

**All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences**

- 1** Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
- 2** Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.
- 3** The services of any such ADR entity must be free of charge to the customer.
- 4** Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
- 5** Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
- 6** Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
- 7** Licensees should keep records of customer complaints and disputes and make them available to the Commission on request.

In this Code, 'ADR entity' means

- a** a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015 and,
- b** whose name appears on the list of providers that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry -- standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.



## 7 Gambling licensees' staff

### 7.1 Gambling licensees' staff

#### **Social responsibility code provision 7.1.1**

##### **Gambling staff – casinos**

##### **All non-remote casino licences**

- 1 Licensees must have and put into effect policies and procedures to manage relationships between staff and customers, based on the principle that in carrying out their duties staff must not engage in any conduct which is, or could be, likely to prejudice the licensing objectives.

#### **Social responsibility code provision 7.1.2**

##### **Responsible gambling information for staff**

##### **All licences, including betting ancillary remote licences, but not other ancillary remote licences**

- 1 Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

#### **Ordinary code provision 7.1.3**

##### **Gambling staff and irregular betting**

##### **All betting operating licences**

- 1 Licensees should have employment policies that:
  - require employees to report any indicators of irregular and/or suspicious betting to their employer; and
  - prohibit their employees from using information related to irregular and/or suspicious betting for the purpose of placing their own wagers, either with their employer or with other operators.

## 8 Information requirements

### 8.1 Information requirements

#### Ordinary code provision 8.1.1

##### Information requirements – ordinary code

##### All licences

- 1** As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
- 2** Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify<sup>1</sup>, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence<sup>2</sup>:
  - a** any material change in the licensee's structure or the operation of its business
  - b** any material change in managerial responsibilities or governance arrangements
  - c** any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

<sup>1</sup> These matters are to be reported to us online via our 'eServices' digital service on our website [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk).

<sup>2</sup> Events which **must** be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

#### Ordinary code provision 8.1.2

##### Provision of information in respect of cheating

##### All betting operating licences including betting intermediary, ancillary remote betting and remote betting intermediary (trading room only)

- 1** In considering their obligations under licence condition **15.1.2** licensees should in particular keep in mind the scope of the offence of cheating. The Commission would expect to be notified<sup>1</sup> of any information a licensee has which causes them to know or suspect that there has been interference or attempted interference with:
  - a** an event which has taken or is taking place in Great Britain on which bets have been or are likely to be or to have been placed (whether in Great Britain or elsewhere); or
  - b** an event which has taken or is taking place outside Great Britain on which bets have been or are likely to be or to have been placed in Great Britain.

<sup>1</sup>Information relating to sports betting integrity should be sent directly to the [Sports Betting Intelligence Unit \(SBIU\)](#).



## 9 Gaming machines in gambling premises

### 9.1 Gaming machines in gambling premises

#### **Social responsibility code provision 9.1.1**

##### **Gaming machines in gambling premises – betting**

**All non-remote general betting operating licences, except where betting is offered under a 2005 Act casino premises licence**

- 1 Gaming machines may be made available for use in licensed betting premises only where there are also substantive facilities for non-remote betting, provided in reliance on this licence, available in the premises.
- 2 Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
- 3 Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing betting facilities.

#### **Social responsibility code provision 9.1.2**

##### **Gaming machines in gambling premises – bingo**

**All non-remote bingo operating licences**

- 1 Gaming machines may be made available for use in licensed bingo premises only where there are also substantive facilities for non-remote bingo, provided in reliance on this licence, available in the premises.
- 2 Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
- 3 Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.

#### **Social responsibility code provision 9.1.3**

##### **Gaming machines in gambling premises – casino**

**All non-remote casino operating licences, except 2005 Act operating licences**

- 1 Gaming machines may be made available for use in licensed casino premises only where there are also substantive facilities for non-remote casino games and/or games of equal chance, provided in reliance on this licence, available in the premises.
- 2 Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
- 3 Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing facilities for casino games and/or games of equal chance.

## 10 Assessing local risk

### 10.1 Assessing local risk

#### **Social responsibility code provision 10.1.1**

##### **Assessing local risk**

**All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.**

- 1** Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy<sup>1</sup>.
- 2** Licensees must review (and update as necessary) their local risk assessments:
  - a** to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
  - b** when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
  - c** when applying for a variation of a premises licence; and
  - d** in any case, undertake a local risk assessment when applying for a new premises licence.

<sup>1</sup>This is the statement of licensing policy under the Gambling Act 2005.

#### **Ordinary code provision 10.1.2**

##### **Sharing local risk assessments**

**All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences**

- 1** Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.



## Part III

### Suite of general conditions to be attached to personal licences under Section 75 of the Gambling Act 2005

#### Personal licence conditions

##### All personal licence holders

- 1** Personal licence holders must take all reasonable steps to ensure that the way in which they carry out their responsibilities in relation to licensed activities does not place the holder of the operating or any relevant premises licence in breach of their licence conditions.
- 2** Personal licence holders must keep themselves informed of developments in gambling legislation, codes of practice and any Commission guidance (whether issued on the Commission's website or communicated directly to licence holders) relevant to their role. Holders of personal functional licences must keep their technical competence in respect of their licensed activities up to date.
- 3** Personal licence holders must themselves notify the Commission of the occurrence of any of the following key events within ten working days after the licensee becomes aware of the event's occurrence<sup>1</sup>:
  - a** their subsection to any criminal investigation which is listed under Schedule 7 Relevant Offences of the Gambling Act 2005;
  - b** their conviction of any offence listed under Schedule 7 – Relevant Offences of the Gambling Act 2005;
  - c** any current or pending investigation by a professional, statutory, regulatory or government body in Great Britain or abroad;
  - d** the imposition of any sanction or penalty against them following an investigation by any professional, statutory, regulatory or government body in Great Britain or abroad;
  - e** the imposition of a disciplinary sanction against them, including dismissal, for gross misconduct;
  - f** their resignation from a position for which a personal licence is required following commencement of disciplinary proceedings in respect of gross misconduct;
  - g** their disqualification from acting as a company director;
  - h** the presentation of a petition for their bankruptcy or sequestration or their entering into an individual voluntary agreement;
  - i** a change in their name or address.

<sup>1</sup> These matters are to be reported to us online via the 'Manage and maintain your licence' service on our website [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

# Index of licence conditions

If using an electronic version of this document, please click on the headings to move to the relevant provision.

<b>1</b>	<b>Qualified persons and personal licences</b>	<b>5</b>
1.1	<b>Qualified persons</b>	5
1.1.1 LC	Qualifying position	5
1.1.2 LC	Tracks	5
1.2	<b>Personal licences</b>	6
1.2.1 LC	Personal management licences	6
1.2.2 LC	Casino personal functional licences	7
1.2.3 LC	Lottery personal management licences	7
<b>2</b>	<b>Technical standards, equipment specifications, remote gambling equipment and gambling software</b>	<b>8</b>
2.1	<b>Key equipment</b>	
2.1.1 LC	Access to (and provision of data from) key equipment	8
2.2	<b>Gambling software</b>	8
2.2.1 LC	Gambling software	8
2.3	<b>Technical standards and equipment specifications</b>	9
2.3.1 LC	Technical standards	9
2.3.2 LC	Bingo equipment specifications	9
2.3.3 LC	Casino equipment specifications	9
<b>3</b>	<b>Peer to peer gaming, other networks and hosting</b>	<b>10</b>
3.1	<b>Peer to peer gaming, other networks and hosting</b>	10
3.1.1 LC	Peer to peer gaming	10
3.1.2 LC	Other networks	11
3.1.3 LC	Hosting	12
<b>4</b>	<b>Protection of customer funds</b>	<b>13</b>
4.1	<b>Segregation of funds</b>	13
4.1.1 LC	Segregation of funds	13
4.2	<b>Disclosure to customers</b>	13
4.2.1 LC	Disclosure to customers	13



<b>5</b>	<b>Payment</b>	<b>14</b>
5.1	<b>Payment services</b>	14
5.1.1 LC	Cash and cash equivalents	14
5.1.2 LC	Payment methods services	14
<b>6</b>	<b>Provision of credit by licensees and the use of credit cards</b>	<b>15</b>
6.1	<b>Provision of credit</b>	15
6.1.1 LC	Provision of credit	15
6.1.2 LC	Use of credit cards	15
<b>7</b>	<b>General ‘fair and open’ provisions</b>	<b>15</b>
7.1	<b>Fair and transparent terms of practices</b>	15
7.1.1 LC	Fair and transparent terms of practice	15
<b>8</b>	<b>Display of licensed status</b>	<b>16</b>
8.1	<b>Display of licensed status</b>	16
8.1.1 LC	Display of licensed status	16
8.1.2 LC	Display of licensed status – B2B operators	16
8.1.3 LC	Display of licensed status – societies and local authorities	17
<b>9</b>	<b>Types and rules of casino and other games</b>	<b>17</b>
9.1	<b>Casino and bingo games</b>	17
9.1.1 LC	Rules of casino games	17
9.1.2 LC	Prohibited bingo prize games	17
<b>10</b>	<b>Tipping of casino employees</b>	<b>17</b>
10.1	<b>Tipping of casino employees</b>	17
10.1.1 LC	Tipping – personal licence holders	17
<b>11</b>	<b>Lotteries</b>	<b>18</b>
11.1	<b>Lotteries – societies and local authorities</b>	18
11.1.1 LC	Lotteries – societies and local authorities	18
11.2	<b>Lotteries – managers</b>	20
11.2.1 LC	Lotteries – managers	20
<b>12</b>	<b>Anti-money laundering</b>	<b>22</b>
12.1	<b>Prevention of money laundering and terrorist financing</b>	22
12.1.1 LC	Prevention of money laundering and terrorist financing	22
12.1.2 LC	Measures for operators based in foreign jurisdictions	22
<b>13</b>	<b>Pool betting</b>	<b>23</b>
13.1	<b>Pool betting</b>	23
13.1.1 LC	Pool betting	23
13.1.2 LC	Pool betting – football pools	23
13.1.3 LC	Pool betting – annual accounts	23

<b>14</b>	<b>Access to premises</b>	<b>23</b>
14.1	<b>Access to premises</b>	23
14.1.1 LC	Access to premises	23
<b>15</b>	<b>Information requirements</b>	<b>24</b>
15.1	<b>Reporting suspicion of offences etc</b>	24
15.1.1 LC	Reporting suspicion of offences etc - non-betting licences	24
15.1.2 LC	Reporting suspicion of offences etc - betting licences	24
15.2	<b>Reporting key events and other reportable events</b>	25
15.2.1 LC	Reporting key events	25
15.2.2 LC	Other reportable events	28
15.2.3 LC	Other reportable events – money laundering, terrorist financing, etc	29
15.3	<b>General and regulatory returns</b>	29
15.3.1 LC	General and regulatory returns	29
<b>16</b>	<b>Responsible placement of digital adverts</b>	<b>30</b>
16.1	<b>Responsible placement of digital adverts</b>	30
16.1.1 LC	Responsible placement of digital adverts	30
<b>17</b>	<b>Customer identity verification</b>	<b>30</b>
17.1	<b>Customer identity verification</b>	30
17.1.1 LC	Customer identity verification	30



## Index of code of practice provisions

If using an electronic version of this document, please click on the headings to move to the relevant provision.

<b>1</b>	<b>General - Cooperation and responsibility for third parties</b>	<b>31</b>
1.1	<b>Cooperation and responsibility for third parties</b>	31
1.1.1	OC Cooperation with the Commission	31
1.1.2	SR Responsibility for third parties – all licences	32
1.1.3	SR Responsibility for third parties – remote	33
<b>2</b>	<b>Financial requirements - Anti-money laundering</b>	<b>33</b>
2.1	<b>Anti-money laundering</b>	33
2.1.1	OC – casino	33
2.1.2	OC – other than casino	33
<b>3</b>	<b>Protection of children and other vulnerable persons</b>	<b>34</b>
3.1	<b>Combating problem gambling</b>	34
3.1.1	SR Combating problem gambling	34
3.2	<b>Access to gambling by children and young persons</b>	<b>35</b>
3.2.1	SR – casinos SR code	35
3.2.2	OC – casinos ordinary code	36
3.2.3	SR – AGC SR code	37
3.2.4	OC – AGC ordinary code	38
3.2.5	SR – bingo and FEC SR code	39
3.2.6	OC – bingo and FEC ordinary code	40
3.2.7	SR – betting SR code	41
3.2.8	OC – betting ordinary code	42
3.2.9	SR – lottery SR code	42
3.2.10	OC – lottery ordinary code	42
3.2.11	SR – remote SR code	43
3.2.12	OC – remote ordinary code	43
3.2.13	SR – remote lottery SR code	44
3.2.14	OC – remote lottery ordinary code	44
3.3	<b>Gambling management tools and responsible gambling information</b>	<b>45</b>
3.3.1	SR Responsible gambling information	45
3.3.2	OC Responsible gambling information – foreign languages	45
3.3.3	SR Betting B2 – time and monetary thresholds	46
3.3.4	SR Remote time-out facility	46
3.4	<b>Customer interaction</b>	<b>47</b>
3.4.1	SR Customer interaction – SR code	47
3.4.2	SR Customer Interaction – lotteries SR code	47

## Index of code of practice provisions (continued)

<b>3.5</b>	<b>Self-exclusion</b>	<b>48</b>
3.5.1	SR – non-remote and trading rooms SR code	48
3.5.2	OC – non-remote ordinary code	49
3.5.3	SR – remote SR code	50
3.5.4	OC – remote ordinary code	51
3.5.5	SR – remote multi-operator SR code	52
3.5.6	SR – multi-operator non-remote SR code	52
3.5.7	OC – multi-operator non-remote ordinary code	52
3.5.8	SR – non-remote lottery SR code	53
<b>3.6</b>	<b>Employment of children and young persons</b>	<b>54</b>
3.6.1	OC – lottery and pool betting	54
3.6.2	OC – bingo	54
3.6.3	OC – casino	55
3.6.4	OC – betting	56
3.6.5	OC – AGCs	56
3.6.6	OC – FECs	57
3.6.7	OC – remote	57
3.6.8	OC – remote pool betting	57
<b>3.7</b>	<b>Provision of credit by licensees and the use of credit cards</b>	<b>58</b>
3.7.1	SR Provision of credit	58
<b>3.8</b>	<b>Money-lending between customers</b>	<b>58</b>
3.8.1	OC – casinos	58
3.8.2	OC – other than casinos	59
<b>3.9</b>	<b>Identification of individual customers</b>	<b>59</b>
3.9.1	SR Identification of individual customers – remote	59
<b>4</b>	<b>'Fair and open' provisions</b>	<b>60</b>
<b>4.1</b>	<b>Fair terms</b>	<b>60</b>
4.1.1	SR Fair terms	60
<b>4.2</b>	<b>Display of rules and supervision of games</b>	<b>60</b>
4.2.1	SR Display of rules – casino	60
4.2.2	SR Display of rules – bingo	60
4.2.3	SR Display of rules – remote SR code	60
4.2.4	OC Display of rules – remote ordinary code	61
4.2.5	SR Supervision of games	61
4.2.6	SR Display of rules – betting	61
4.2.7	SR Display of rules – on-course betting	62
4.2.8	OC Betting integrity	62
4.2.9	SR Display of rules – pool betting	63
4.1.10	SR Pool betting	63
<b>4.3</b>	<b>Additional consumer information</b>	<b>64</b>
4.3.1	SR Publication of % of lottery proceeds returned	64
4.3.2	SR Marketing of branded lotteries	64



	4.3.3 SR	Lotteries – Information to consumers	64
<b>5</b>	<b>Marketing</b>		<b>65</b>
	5.1	<b>Rewards and bonuses</b>	65
	5.1.1 SR	Rewards and bonuses – SR code	65
	5.1.2 OC	Proportionate rewards	65
	5.1.3 SR	Alcoholic drinks	65
	5.1.4 SR	Promotion by agents	66
	5.1.5 OC	Mailing of lottery tickets	66
	5.1.6 SR	Compliance with advertising codes	66
	5.1.7 SR	Compliance with advertising codes (lotteries)	66
	5.1.8 OC	Compliance with industry advertising codes	67
	5.1.9 SR	Other marketing requirements	68
	5.1.10 OC	Online marketing in proximity to information on responsible gambling	67
	5.1.11 SR	Direct electronic marketing consent	67
<b>6</b>	<b>Complaints and disputes</b>		<b>68</b>
	6.1	<b>Complaints and disputes</b>	68
	6.1.1 SR	Complaints and disputes	68
<b>7</b>	<b>Gambling licensees' staff</b>		<b>69</b>
	7.1	<b>Gambling licensees' staff</b>	69
	7.1.1 SR	Gambling staff – casinos	69
	7.1.2 SR	Responsible gambling information for staff	69
	7.1.3 OC	Gambling staff and irregular betting	69
<b>8</b>	<b>Information requirements</b>		<b>70</b>
	8.1	<b>Information requirements</b>	<b>70</b>
	8.1.1 OC	Information requirements – ordinary code	70
	8.1.2 OC	Provision of information in respect of cheating	70
<b>9</b>	<b>Gaming machines in gambling premises</b>		<b>71</b>
	9.1	<b>Gaming machines in gambling premises</b>	<b>71</b>
	9.1.1 SR	- betting	71
	9.1.2 SR	- bingo	71
	9.1.3 SR	- casino	71
<b>10</b>	<b>Assessing local risk</b>		<b>72</b>
	10.1	<b>Assessing local risk</b>	<b>72</b>
	10.1.1 SR	Assessing local risk	72
	10.1.2 OC	Sharing local risk assessments	72

## Part III Personal licence conditions **73**

---

**making gambling fairer and safer**  
**[www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)**

[Return to overview contents page](#)





The CPD Standards Office

CPD PROVIDER: 21518  
2017 - 2019

[www.cpdstandards.com](http://www.cpdstandards.com)



**Social Responsibility and Interaction**

**WORKBOOK**

## Agenda

Topic	Length
Social Responsibility in the gambling industry	20 min
Gambling in Great Britain	10 min
Understanding why problem gambling occurs	20 min
<b>BREAK</b>	
Case study	
The impact of problem gambling in Bingo clubs	20 min
Identifying problem gambling in Bingo	25 min
<b>LUNCH</b>	
Prevention measures	20 min
Screening, brief advice, and brief intervention	15 min
Understanding FRAMES	20 min
Applying FRAMES	25 min
<b>BREAK</b>	
Dealing with difficult conversations	20 min
Applying the right intervention	5 min
Signposting to GamCare services	10 min
Self-care	15 min
Summary	10 min

N.B: These timings are an estimate, discussion time can vary, and time taken on each section is learner led



## Social Responsibility

Social responsibility in gambling is about protecting players and others from gambling-related harm.

Gambling regulation covers three main objectives<sup>1</sup>:

- 1) Crime should be kept out of gambling
- 2) It should be conducted in a fair and open way
- 3) Children and other vulnerable people should be protected from harm or exploitation from gambling

When those in the gambling industry interact with customers and with one another about gambling in a proactive and responsible way, the benefits to the organisation include:

- Improved company culture
- Positive reputation
- Staff gain additional skills and abilities

These factors all lead to an increase in customer loyalty and retention. According to recent Gambling Commission data<sup>2</sup>, the reputation of a company being fair and trustworthy is the top choice when selecting an operator. With over 100,000 people working in the gambling industry, social responsibility plays a huge part in addressing the issues around problem gambling.

## Notes

What are your 'light bulb moments' from this session?



<sup>1</sup> <http://www.gamblingcommission.gov.uk/for-gambling-businesses/Compliance/General-compliance/Social-responsibility>.

<sup>2</sup> <http://live-gamblecom.cloud.contensis.com/PDF/survey-data/Gambling-participation-in-2017-behaviour-awareness-and-attitudes.pdf>

## Gambling and Bingo in Great Britain

Around 46% of people in the UK (aged 16+) have gambled in the past four weeks. The most popular gambling activities are the National Lottery and scratch cards, but online gambling is becoming increasingly popular each year, as 18% gambled online in the past four weeks.

Participation in Bingo is about 5% of the adult population (Nat Cen 2016).

Licensed retail Bingo employs 12% of all gambling sector employees and is home to over 47,000 Electronic Bingo Terminals and 21,000 gaming machines. (RS annual survey 2018).

The most common reasons for people to participate in Bingo is to socialise, and because it is fun and safe. (Ipsos MORI 2016). 92% of Bingo customers visit with friends or meet someone at the club.

The Licensed Bingo Industry represents 5% of Gambling Industry Gross Gaming Yield and 5% of all gambling premises.

Problem gambling rates in Bingo are estimated to be 2.5% of regular players (more than once a fortnight), and they are more likely to play Bingo on a handheld and/or play gaming machines. PG rates in Bingo are generally much lower than most other gambling sectors except the Lottery (Nat Cen 2016).

## Notes

What are your 'light bulb moments' from this session?





## Why Problem Gambling Occurs: Reasons and Risk Factors

Problem gambling occurs for several reasons.

It can be scientifically explained by the build-up of dopamine releases from excessive gambling. This makes the gambler learn to experience the pleasure that comes from a dopamine release. They can also experience withdrawal symptoms if they don't get their 'hit'.

Problem gambling can also be explained by common beliefs that occur in some people, making them less self-aware about their gambling and more prone to risky gambling behaviours. Common beliefs change the player's perception of their likelihood of winning and cause them to make irrational decisions about their gambling.

In addition to this, there are certain risk factors that make an individual more prone to becoming a problem gambler. These include situational factors, such as problem gambling amongst peers or substance misuse issues, and includes historical factors such as inconsistent parental discipline and lower socioeconomic background.

### Notes

What are your 'light bulb moments' from this session?



## Case Studies

1. A member of the public has contacted your bingo club, he says that he is the partner of a customer who had self-excluded, but was allowed into the club and went in to the arcade on Friday night and played for three hours until 1AM on Saturday. He says that she has been self-excluded for the last 4 months but was still allowed in.

"Can you please tell me why you prey on vulnerability and just ignore your self-exclusion policy? She was playing the Spartacus machines and lost a lot of money. This is disgusting and I want our money back, I am sorry, but I won't give up until something is done about it because self-exclusion means that she shouldn't be allowed in."

***What would you do in this case?***

2. A Bingo player is also a local authority carer. As part of her duties she takes a minibus of pensioners to a Bingo club once a week. She has developed a gambling problem spending too much on the handheld terminals and decides to self-exclude from Bingo. However, she continues to drive the bus to the Bingo club once a week which means she is exposed to the Bingo environment. She informs the club of her self-exclusion, and she asks to sit at the back of the club and observe whilst having a cuppa.

"I had a bit too much of those handheld machines you see; the self-exclusion was all about that really. I haven't got an issue going into the Bingo hall, and since I'm here every week, it makes sense for me to just sit at the back so I can keep an eye on the group. I know I have a self-exclusion, but it doesn't matter if I do no gambling, does it? I don't want to just sit in the bus for hours!"

***What conversation needs to be had with her and what if any action needs to be taken?***

3. Player returns from 12-month self-exclusion, reinstatement interview completed with manager. Player is looking forward to playing again with friends and family. They had issues in the past with obsessive machine gameplay and losing track of time and consequently money spent.

Within three weeks of return, the player's visit patterns are starting to increase, and the player is starting to visit on their own. They are not socialising with other players and it seems their appearance is deteriorating with few breaks from gaming machine play taken during their visits.

***What action should we take?***

## Notes



## The Impact of Problem Gambling

Problem gambling has huge negative impacts which affect the gambler and others in their lives. The impacts to the gambler can be:

- Financial – including loss of savings, borrowing money, and even stealing from family members
- Mental – including mood disorders, anxiety and neurotic symptoms, suicidal ideation
- Physical – including substance misuse, irritability, somatic pain, and violent behaviour

The impact on affected others is wide-ranging and includes isolation, shame, loss of trust, and financial problems. Gambling addiction can also impact children in damaging ways.

## Notes

What are your 'light bulb moments' from this session?



## EXERCISE – Video Clip

How are the people's lives impacted by problem gambling?

---

---

---

---

---

---

---

---



## Identifying Problem Gambling

There are several ways to identify problem gambling in an individual. These include alerts, which those in the gambling industry might be able to spot, such as bonus chasing, frequent deposit limit changes, or complaints about the fairness of the game.

In addition to this, there are nine signs identified in the Diagnostic and Statistical Manual of Mental Disorders (DSM-V)<sup>3</sup> that enable us to judge the severity of an individual's gambling. These are:

1. **Tolerance:** Needs to gamble with increasing amounts of money in order to achieve the desired excitement.
2. **Withdrawal:** Is restless or irritable when attempting to cut down or stop gambling.
3. **Loss of control:** Has made repeated unsuccessful efforts to control, cut back, or stop gambling
4. **Preoccupation:** Is often thinking about past gambling or planning to gamble
5. **Escape:** Often gambles when feeling distressed
6. **Chasing:** After losing money gambling, often returns another day to get even
7. **Lying:** Lies to conceal the extent of involvement with gambling
8. **Risked relationships:** Has jeopardized or lost a significant relationship, educational, or career opportunity because of gambling.
9. **Financial:** Relies on others to provide money to relieve desperate financial situations caused by gambling

The DSM-V guidelines suggest that current severity is explained as *mild* if only 4-5 of the above criteria are met, *moderate* if 6-7 are met, and *severe* if 8-9 are met.

The guidelines suggest that problematic gambling behaviour is indicated by the individual exhibiting four or more of the DSM-V indicators within a 12-month period.

## Notes

What are your 'light bulb moments' from this session?



## Other Screening Tools

Alongside the DSM-V, there are several other screening tools, one such being the Problem Gambling Severity Index. This is a popular tool that many operators incorporate into their online self-assessments. It addresses all the necessary components to define a gambling problem. However, it has been criticised for not providing adequate scope and that it may not be suitable for the detection of gambling related harm, even if it is an effective way of defining a problem.

	Not at all	Rarely	Sometimes	Often
1. Have you bet more than you could really afford to lose?				
2. Still thinking about the last 12 months, have you needed to gamble with larger amounts to get the same feeling of excitement?				
3. When you gambled, did you go back another day to try to win back the money you lost?				
4. Have you borrowed money or sold anything to get money to gamble?				
5. Have you felt you might have a problem with gambling?				
6. Has gambling caused you any health problems, including stress or anxiety?				
7. Have people criticised your betting or told you that you had a gambling problem, regardless of whether or not you thought it was true?				
8. Has your gambling caused any financial problems for you or your household?				
9. Have you felt guilty about the way you gamble or what happens when you gamble?				
<b>Non-problem gambler - Score: 0</b> <ul style="list-style-type: none"> <li>Non-problem gamblers gamble with no negative consequences.</li> </ul>				
<b>Low-risk gambler - Score: 1-2</b> <ul style="list-style-type: none"> <li>Low-risk gamblers experience a low level of problems with few or no identified negative consequences. For example, they may very occasionally spend over their limit or feel guilty about their gambling.</li> </ul>				
<b>Moderate-risk gambler - Score: 3-7</b> <ul style="list-style-type: none"> <li>Moderate-risk gamblers experience a moderate level of problems leading to some negative consequences. For example, they may sometimes spend more than they can afford, lose track of time or feel guilty about their gambling.</li> </ul>				
<b>Problem gambler - Score: 8 or above</b> <ul style="list-style-type: none"> <li>Problem gamblers gamble with negative consequences and a possible loss of control. For example, they may often spend over their limit, gamble to win back money and feel stressed about their gambling.</li> </ul>				



## Case Study (non-Bingo) – Tracey, 38

I have a gambling addiction. It took me a long while, and a lot of money and stress, before I realised it. But that's the truth of the matter. I can look you in the eye today and tell you that I'm a compulsive gambler.

My addiction started in my early twenties. I first gambled on Cheltenham races at 18 whilst at work with colleagues and won. Then I signed up with an online casino out of boredom one day and deposited a tenner, lost that and didn't really play again. A couple of months later I started dabbling with more online slots. Every day more and more. It was fun, a buzz, especially on the rare occasion that I would score.

By my mid-twenties, most of my friends were settling down and having kids. They didn't have as much time to play online or go to the races for that matter, but I wasn't interested in slowing down. My weekend gambling was what got me through the week. It was all I could think of to get me through the boredom of work and everyday life.

But it wasn't enough. As well as being a regular at the local casino, I created a few more accounts online. I thought the more you have the more offers and free bets come in. I began playing the Black Jack tables and roulette on Saturday nights. Often to try and win back my losses from the slots, horses, dogs – whatever I'd bet on earlier that day.

Soon enough though, I'd be visiting the casino three, four, five nights a week at the height of my gambling problem. When the races or the casino were shut, I was gambling online. Now I was doing it all; online poker, in-game betting, bingo, any lucky fun games, slots. I got such a buzz from the wins, no matter how big or small. When I was up, I'd never walk away with my winnings. Never. They'd go straight back, in search of a bigger rush.

So, I called GamCare. They arranged for me to go into rehab. I'd have regular therapy sessions to help me to change how I was behaving and manage my impulses to gamble. It was tough. Not the sessions so much but stopping. Occupying myself in other ways.

It was a long slog, but I stuck with my treatment programme and I've managed to stay off gambling completely. My life and my family are too important to me now to ever change back to my old ways. If I could offer advice to anyone, it would be to get help now. It is the only way and you won't regret it.

My wife Sarah and I would get into blazing rows about how our money was just running through our fingers. I wasn't just squandering my own wages, but I was dipping into our joint account and lying about it too. We were barely able to pay for food, let alone the bills and rent. The trouble is, the worse things got the more I turned to gambling to escape reality. I'd carry on regardless, gambling bigger stakes each time to try and dig us out of a hole and feel good about myself again. Neither of which ever happened.

The tipping point was when Sarah told me that she wanted us to have a child. When Jasmine was born, I got a real wake up call. I knew full well that, without help, I would gamble away our money. Money that we needed.

# EXERCISE – Case Study BINGO

Read the case study and circle where you spot the following signs. Shout 'BINGO!' when you've found eight or nine.

Chasing

Withdrawal

Loss of control

Preoccupation

Tolerance

Financial

Lying

Risked relationships

Escape

## Prevention Measures

There are several prevention measures and possible interventions to reduce the prevalence of problem gambling and its associated harm. Prevention measures implemented by the gambling industry include the provision of responsible gambling information, self-exclusion, and deposit limits for players.

GamCare also offers several ways in which you can support those that are experiencing gambling- related harm, for example our self-assessment tool, which can be found online at:

<https://www.gamcare.org.uk/get-advice/self-assessment-tool>

This tool was created for GamCare by Sustainable Interaction. If you are interested in developing something similar for your site, we are happy to put you in contact.

We also have a number of tools for customers to support themselves, such as goal planners, a gambling diary, workbooks, and much more.

<https://www.gamcare.org.uk/get-advice/self-help-resources>

## Notes

What are your 'light bulb moments' from this session?





## Screening, Brief Advice and Brief Interventions

In order to apply the appropriate intervention with a gambler, it can be useful to use a short screening tool to identify whether their gambling behaviour is social, moderate, or severe.

One theoretical screening tool asks the following questions, covering the past 12 months:

- Have you bet more than you could really **afford to lose**?
- Have people **criticised your betting** or told you that you had a gambling problem (regardless of whether you thought it was true)?
- Have you **felt guilty** about the way you gamble or what happens when you gamble?
- Have you ever been affected by someone else's gambling?

Never	Rarely	Sometimes	Always
0	1	2	3

If a gambler scores 1 or more, it is clinically advised to conduct an intervention, which could involve Brief Advice or a Brief Intervention.

**Brief Advice involves a short conversation** (less than 5 minutes) in which you provide resources on further support or direction to the GamCare website where the customer can access further information.

**A Brief Intervention involves an extended conversation** that is personalised to the customer, generally using the FRAMES approach.

The approach you take depends on the situation and the receptiveness of the gambler.

### Notes

What are your 'light bulb moments' from this session?



## Core Skills (listening and reflecting to promote change at the pace the person wants to change)

There are four core skills for managing interventions, described as the OARS.

- **O**pen questions – to encourage individual to talk about what is on their mind
- **A**ffirmations – statements about anything positive that the practitioner notices about the individual to build self-confidence and self-efficacy
- **R**eflections – understanding what the individual is thinking and feeling then saying it back to them to convey empathy and understanding
- **S**ummaries – long reflections of more than one individual statement that can help guide the individual towards positive change

## Notes

What are your 'light bulb moments' from this session?



## EXERCISE

Fill in the exercises below to help with your application of the core OARS skills for Motivational Interviewing. There is one question for each of the OARS skills:

- Open questions
- Affirmations
- Reflections
- Summaries

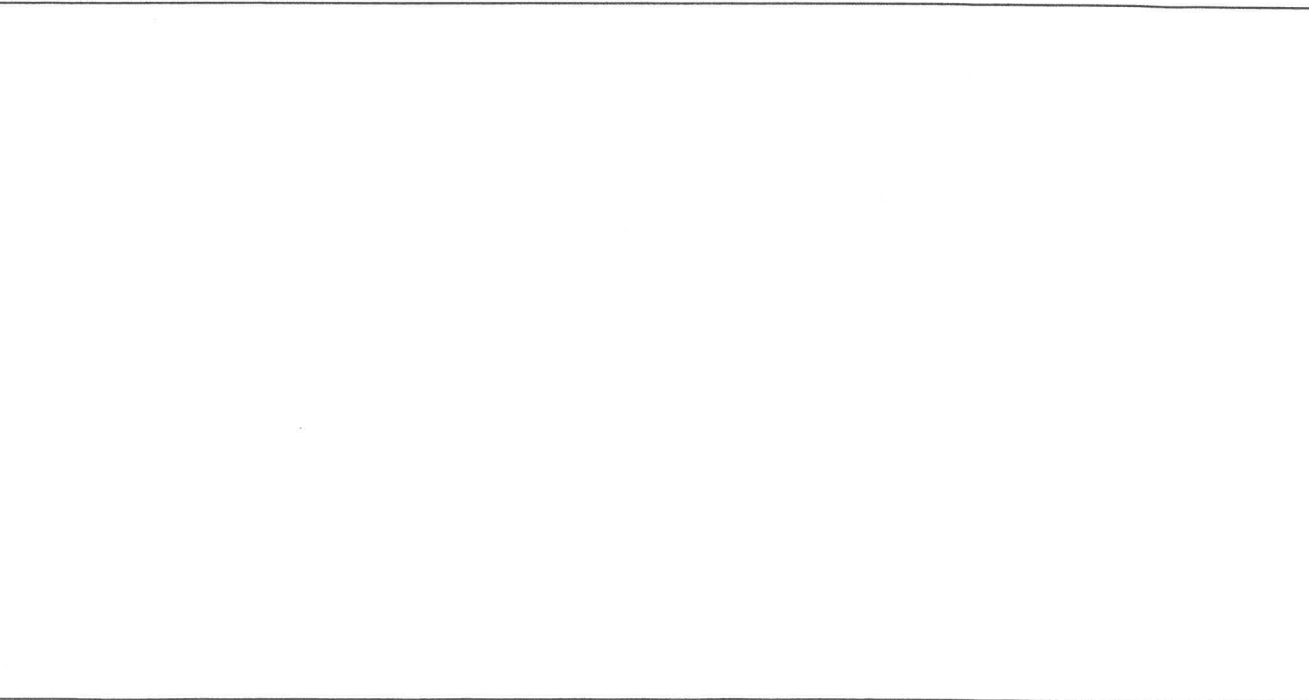
### Open questions activity: Starting with How..., In what ways..., What..., When..?

Turn these closed questions into open questions:

Closed Questions	Open Questions
Are you suffering from your gambling?	
How many times a week do you gamble?	
Don't you want to stop gambling?	

**Affirmations activity:** Positive and meaningful statements that will help a person feel more confident.

Give three examples of affirmations you could give to an individual who is telling you about their gambling journey.





**Reflections activity: Starting with: It sounds like.., I hear you saying that.., If I hear correctly..., You seem to be saying...**

Write down a reflection for each of the following statements that the individual makes.

Individual statement	Reflection
I don't think I have a gambling problem.	
I've been gambling so long I think it's just part of my lifestyle rather than a problem I need to deal with.	
Well, I don't like the problems its causing with my partner.	

**Summaries activity: Give the key ideas, retelling the story with the main points.**

Read the statements from your individual below and respond with a summary that packages up the parts of their story that will help them be motivated to make a change.



**Summary**

## Understanding FRAMES

It is recommended that Brief Interventions are conducted using the FRAMES model. Applying FRAMES provides a safe, non-judgemental space to help the gambler take responsibility for their gambling and to seek advice and support to help them reduce the harm from their gambling. Using FRAMES, the practitioner should try to incorporate the following components:

- Feedback about personal risk or level of current harm
- Responsibility for choices and change sits with the person. It is not the role of the professional to confront or persuade. Respect the person's autonomy.
- Advice about the costs and consequences of their behaviour
- Menu of options or strategies to support positive change; help with goals and action planning if appropriate to the person.
- Empathy for the person: listen and reflect; maintain rapport; use an empathic communication style.
- Self-efficacy - convey optimism and strengthen the person's self-belief in their ability to change.

## Notes

What are your 'light bulb moments' from this session?



## The Artful Critique

It is vitally important when giving feedback (if it is to be successful in behavioural change) to avoid making personal attacks. When someone feels their character is being attacked this can create a sense of bitterness, resentment, and even complete disengagement – known as stonewalling – a complete shut down and destruction of motivation and energy.

In the workplace a study of 108 managers in the Journal of Applied Psychology from a variety of different fields displayed inept criticism as above mistrust, personality struggles and disputes over power and pay as a reason for conflict at work.

### Be specific:

Pick a specific incident, one that illustrates a key problem that needs changing or a pattern of deficiency, such as the inability to follow through with certain decisions. It is demoralising for people to hear that they are doing things wrong or poorly if they don't have specifics to work with. Focus on specifics – both positive and negative – specificity is just as important for praise as it is for criticism ... you must be able to learn from it.

### Offer a solution:

The critique, like all useful feedback, should point to a way to fix a problem. Otherwise it can be frustrating, demoralising and demotivating. The critique can open new doors and offer novel insights, or simply sensitise them to deficiencies that need attention.

### Be present:

Critiques, like praise, are most effective when done privately and directly. It should not be impersonal and there must be space for the person to ask for clarification and have an opportunity to respond and reflect.

### Be sensitive:

This is a call for empathy, for being attuned to what you say and how you say it, and how it impacts the person at the receiving end is vital for the effectiveness of the criticism. When empathy is not displayed, feedback can be callous or even hurtful.



## EXERCISE

**Feedback:** Have a look at the examples on the next page. How would you feed back to these individuals on their behaviour according to the 'situation-behaviour-impact' tool?

Situation:

Behaviour:

Impact:

**Responsibility:** List three questions you could ask to demonstrate acknowledgement that the responsibility for change sits with the gambler themselves:

- 1.
- 2.
- 3.

**Advice:** Summarise a package of advice that might be useful when supporting these individuals.

- 
- 
- 

**Menu of Options:** Give an example of how you might phrase the advice you offer.

“

”

**Empathy:** List some ways to demonstrate empathy, acceptance and compassion during a brief intervention.

**Self-efficacy:** Offer two motivational affirmations to convey optimism about the gambler's ability to change.

- 1.
- 2.

## EXERCISE

Pick 2 cases and note down how you can apply FRAMES elements to give feedback.

### Case One:

Jane is 23. She has recently started meeting friends at a newly refurbished local bingo club before a night out on the town; her and her friends use the fruit machines. Jane enjoys using the fruit machines as it makes her feel connected to her friends. However, she has lost up to £200 in a single night using the machines, and her girlfriends want to know where the money has come from. She thought by spending more money, she would eventually get it back. She is slow to open up about the issue of money at first and seems anxious that she could get into trouble at home and with her friends.

### Case Two:

Doreen is 40 and a huge Bingo fan. She plays whenever she can but also enjoys a cigarette or two and has recently started to use Bingo apps to play bingo at home especially when her best friend became ill and she had no one to go to a Bingo club with. She hadn't intended to use them beyond the free offers, but usage escalated as she lost money. Lots of her work friends use the apps as well. She once used a friend's debit card to pay. She's doing okay for money just now, but she says she frequently looks at the websites, and finds it hard to resist offers.

### Case Three:

Joyce is 65 and after becoming retired last year, has been playing Bingo and started to play Lottery/scratch cards to pass the time. She says that it is nice to keep busy as she misses work, so now she's playing Bingo at the club five or six days a week and this is preventing her from time with her newly arrived grandchildren. Joyce is looking to find ways to reduce her bingo gambling and spend more time with her family.

## EXAMPLES:

### Exploring Ambivalence

- “What are some of the things you like about gambling?”
- “What are some of the things you dislike about gambling?”
- “What are some of the reasons why you would want things to stay just the way they are?”

### Open-ended Questions

- “What are some of the reasons for making a change?”
- “How can I help you?”
- “What has happened?”
- “What do you feel is wrong?”
- “What do you have in mind?”
- “How do you see this happening?”
- “What is it that you’d like to see accomplished?”
- “What are your expectations/requirements for this product/service?”
- “What do you see as the next action steps?”

### Eliciting Change Questions

- “What would you like to see *different* about your current situation?”
- “What makes you think you need to change?”
- “What will happen if you *don’t* change?”
- “What will be different if you *do* change?”
- “What concerns do you have?”
- “What would *be the good things about changing* your gambling behavior?”
- “What would you like your gambling to look like if some changes are made?”
- “Is there someone that is concerned about your gambling?”

### Permission to Offer Advice

- “I have some information that could be of use to you...”
- “Do you mind if we discuss some player protection tools that I have in mind that could help you?”
- “How would you feel if we spent a few minutes discussing about...”
- “Would it be okay if I recommended something that I think would be of use to you?”
- “How about we discuss what your concerns are and then I can put forward some options for you?”
- “How does that sound to you?”
- “What other issues are important to you? Would you like to share them with me?”

### Affirmations

- “I hope the information I provided did help you in a way today.”
- “I hope our conversation has been useful to you.”
- “I trust that the player protection tools we discussed about will enable to have more control over your gambling the way you wish to.”
- “You sound determined and confident to change the situation; I wish you all the best with it.”
- “I wish you all the best in what you are looking for, have a great day.”



## Applying FRAMES

When applying FRAMES, it's important to incorporate all its elements in the natural flow of the conversation. This might involve:

- Giving the gambler specific feedback about a DSM sign you've noticed
- Reinforcing that it is the gambler's responsibility and choice to make a change, but that you will support them by providing advice and resources
- Preparing yourself with player protection tool options and GamCare leaflets, and presenting these as a choice for the gambler to make
- Listening reflectively to the gambler about their experience and being kind and respectful in response to their perspective
- Letting the gambler know that you are impressed by their commitment to change and sharing your hope that they will be able to

## Notes

What are your 'light bulb moments' from this session?



## Dealing with Challenging Conversations

During your conversations about gambling you may come across some difficult situations. These might include suicidal people, family members of gamblers, gamblers who make regular and repeated complaints, and problem gamblers who've relapsed. It's important to know the appropriate action when dealing with these situations

### Action in the face of challenging conversations

- ❖ *Family member of a gambler:* Honour the confidentiality, be helpful with information about how they can help themselves, talk to them about GamCare's services for affected others.
- ❖ *Regular repeat caller/complainer:* Determine whether a brief intervention is appropriate or refer to GamCare services.
- ❖ *Relapsing problem gambler:* If they have player protection tools in place and they still feel there is a problem, discuss with them further options of how to protect themselves and refer to services.
- ❖ *Suicidal person:* Keep them talking, call the police, and try and get as much information about the person as you can.

**DON'T FORGET TO DEBRIEF AFTER, TAKE A BREAK, TALK TO SOMEONE**

## Action in the face of challenging conversations

### Action in the face of a suicidal caller.

- *Be yourself as if you are genuinely concerned; your tone and manner will show it.*
- *Listen with empathy, let them unload the despair, anger, or hopelessness. Be patient, be calm, be accepting.*
- *Length of time is important as it gives relief, shows that someone cares and a feeling of being understood.*
- *Do not go through it alone (ask for help, debrief after with colleagues, ask for support local counselling, call GamCare).*

### What should be Avoided:

- *Arguing, problem solving, giving quick advice, making judgement or making them feel that they have to justify their suicidal thoughts.*

## Notes

## CLEO: Dealing with Challenging Situations

### Clarify

Be approachable and make sure that you understand exactly what has made the customer unhappy.

You need to understand why the customer feels the way that they do. Use open ended questions to determine the facts.

Look for non-verbal cues: are they invading your personal space? Do they have clenched fists or are they making rapid movements with their hands or arms? Are they pointing, poking, or making other threatening gestures? Are they restless, rolling their eyes, or fidgeting? Are they making unblinking eye contact? Are they very quiet and not responding (calm before the storm)?

Focus on what is being said by the customer using their own words: use summaries and reflective listening techniques.

### Listen

Use active listening techniques, as above, don't interrupt or make the customer feel more aggravated by trivialising their situation.

Use the 80:20 rule, listen 80% of the time and keep your talking to a minimum. Ask open ended questions, be attentive, clarify and ask for more information, use reflective listening techniques, paraphrase and summarise, be attuned to and reflect their feelings.

### Empathise

As we have seen, when someone feels that their emotions are being understood, it will alleviate many potential challenges in communication. Also, the simple act of saying sorry can make a big difference – but make sure that it is sincere, so your body language and expressions match what you are saying. Through **clarification** and **listening** actively, you will go a long way in demonstrating empathy.

### Overcome

This is our opportunity to solve the customers complaint and make them happy again, ask them what outcome they would like. Have a genuine conversation about what is possible, remember most of the time a customer simply wants to be heard and respected.

**It is important to stay calm in these situations, remain engaged and don't lose your temper, avoid raising your voice and make sure you mask feelings of frustration. You may be able to use distraction techniques such as offer a seat or glass of water; you can suggest to them to write down their complaint and explain to them the menu of options available to them. Control your body language, too – don't appear confrontational having your hands on your hips, crossing your arms, or standing too close. Don't belittle the customer by rolling your eyes or tapping your feet.**

Have you got any other ideas on how to diffuse challenging customers?



## Applying the right intervention

Sometimes a brief intervention is not the right approach, or it is not enough to support someone dealing with gambling-related harm.

For example, if there is:

- High level of gambling related harm
- Loss of job, family, or identity
- When the person is not responding to advice, information, or Brief Interventions
- When the person is struggling with the effects of **gambling** issues of their own, or of **someone** close to them

In these situations, it is often better to refer or signpost to other services. Always follow the 5 Rs:

- ☒ **Recognise**
- ☒ **Respond**
- ☒ **Report**
- ☒ **Record**
- ☒ **Re-refer**

## Notes

What are your 'light bulb moments' from this session?

