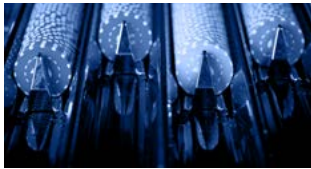




National  
Casino  
Forum

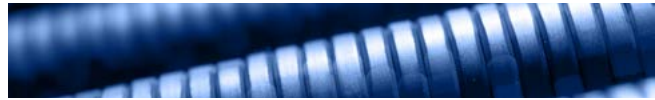


# PLAYING SAFE



## Responsible Gambling

Our statement  
of principles





# RESPONSIBLE GAMBLING: OUR STATEMENT OF PRINCIPLES



The British casino industry is committed to caring for its customers and we want the public, the government and our regulator (The Gambling Commission) to have confidence in the way we conduct our business.

We believe the best way to secure that confidence is to demonstrate unequivocally that we embrace the spirit, as well as the letter, of the 2005 Gambling Act.

Playing Safe expresses our commitment to doing more than the minimum required by law to promote responsible gambling.

Playing Safe sets out who we are, what we are doing now to safeguard our customers, and what we will do next to ensure that casinos remain the safest place to gamble.



National  
Casino  
Forum

## CONTENTS

EXECUTIVE COMMITMENT	4
EXECUTIVE SUMMARY	6
WHO WE ARE	8
WHAT WE DO NOW	9
CUSTOMER FOCUS	11
WHAT WE WILL DO NEXT	12



# EXECUTIVE COMMITMENT

We, the Chief Executives of NCF member companies, accept ownership of the licensing objectives and commit to delivering gambling products responsibly while continuing to innovate and grow our businesses.

We understand that this statement alone will not deliver confidence in the way we operate so, from now on, our commitment to responsible gambling will be increasingly visible. It will also be measurable.

That commitment will be evident from the way we run our businesses and the care we take in offering and marketing our products. It will also be clearly demonstrated by the resources we will apply to our new industry-wide Playing Safe Forum.

As business leaders, we will judge responsibility and profitability with equal commitment – and take pride in doing so.

We are developing ways to measure the impact of the changes we are making.

We are establishing a baseline data framework to help us assess the impact of the Triennial Review and other changes to the way we are permitted to operate.

We will measure our success and judge ourselves by the confidence the public shows in us.

We will review annually and report publicly on our achievements.

Playing Safe is the way we will do business.



'PLAYING SAFE IS THE WAY WE WILL DO BUSINESS'

All NCF members support the Playing Safe initiative, for more information about our principle signatories select the relevant name below:

Signatures

**Ian Burke**  
Chairman and Chief Executive  
THE RANK GROUP PLC

**Peter Brooks**  
President and Chief Operating Officer  
GENTING UK PLC

**Michael Silberling**  
President of International Operations  
CAESARS ENTERTAINMENT

**Richard Noble**  
Chief Operating Officer  
ASPERS GROUP LIMITED

**Howard Aldridge**  
Managing Director  
CROWN ASPINALLS LONDON

**Chris Block**  
Chief Executive  
LES AMBASSADEURS

**Simon Thomas**  
Chief Executive  
THE HIPPODROME CASINO LONDON



## EXECUTIVE SUMMARY

The National Casino Forum (NCF) represents more than 90% of British casinos. Our members are committed to helping people gamble responsibly.

We take seriously our responsibility to protect the young and the vulnerable and already go well beyond our statutory requirements.

Casino customers are served by more licensed staff and trained staff than any other gambling sector to ensure gambling is closely and expertly supervised.

We test ourselves and the confidence we have in our customer protection measures by seeking accreditation from professional care providers.

We know that for a small percentage of our customers gambling can become a problem, so we operate voluntary self-exclusion schemes to help customers, who perceive they might be at risk, to help themselves. We also promote and support research, education and treatment.





'PLAYING SAFE  
IS OUR PLEDGE  
TO DO MORE'...

- A new Playing Safe Forum will **promote responsible gambling in every casino**, not just NCF member casinos
- We are working to make self-exclusion even more effective by developing a **National Voluntary Self-Exclusion Policy** open to all casino operators
- We are working to give customers **better information about comparative risk** of different gambling products
- We will use the most effective modern methods to **make sure our customers hear the responsible gambling message** loud and clear
- We will use advances in technology to **improve customers' awareness of their gambling activity**
- We will work with product manufacturers to develop **new technology that actively promotes responsible gambling**
- And we will develop **metrics and tools for measuring the effectiveness of our Playing Safe initiatives**



## WHO WE ARE

Members of The National Casino Forum (NCF) represent more than 90% of British casinos.

British casinos are integral to the UK's entertainment, hospitality and leisure sector and already offer the highest levels of staffing, monitoring and supervision to protect those vulnerable to gambling-related harm.

The value of our protective measures led former Gambling Minister Richard Caborn, when presenting his evidence to the CMS Select Committee in June 2012, to say: 'Casinos are the safest place to gamble'.

NCF members want to offer customers safe access to the most up to date gambling products, equally and fairly in all casinos in a single, clear, consistent and easily understood regulatory format.

We also want to ensure that casinos should only be permitted to operate where a local authority welcomes the facilities it provides.

### Responsibility to all customers

For most people casino gambling is fun: British casinos have more than 20 million visits every year. Our commercial objective is to offer a modern and diverse range of gambling products for an exciting and enjoyable experience in the safest environments.

We recognise that for some people gambling can become a problem which affects the gambler and the people closest to them.

Though the incidence of problem gambling in the UK is among the lowest in the world, the industry is not complacent: we accept our responsibility to *all* our customers.

Government and regulators also have a part to play. They must recognise that, unless casinos are permitted to meet the demands of the gambling consumer, people will play elsewhere in environments which do not offer the same levels of protection. That would be contrary to the intention of the 2001 Budd Report and the Gambling Act 2005 which sought to balance the risks associated with different kinds of gambling with appropriate levels of protection, and put casinos at top of the



regulatory pyramid.

Providing responsible gambling is a dynamic process that evolves alongside changes in gaming products, monitoring technologies, and public attitudes and expectations of gambling.

To continue to meet both customer demand and the objectives of the Gambling Act 2005, casinos need a measure of flexibility in order to be able to offer the best and latest products and compete fairly on price in a safe and controlled environment.



# WHAT WE DO NOW

Some customer protection measures intended to promote responsible gambling are required by law and regulatory requirements; others have evolved as good practice. Across our industry there are differences in how we deliver those measures.

Casinos in different market segments have very different ways of interacting with their customers. Some larger companies have centrally driven policy frameworks and dedicated personnel. Some smaller companies, with perhaps a single operation, deliver gambling responsibly through the personal commitment of owners and key employees, sometimes with additional guidance from external agencies such as GamCare.

These variants are all safe and acceptable and ensure personal supervision by responsible people.

### Some elements of our various policies are generic and constant:

- The Licence Conditions and Codes of Practice
- Licensed and trained staff
- Accreditation
- Self-exclusion
- Contribution to research, education treatment
- NCF Social Responsibility Forum

### Going beyond the Licence Conditions and Codes of Practice (LCCP)

The Licence Conditions and Codes of Practice (LCCP) Social Responsibility Code (2.2. and 2.4) requires us to ensure all our employees are regularly trained and aware of our obligations in relation to under-age and problem gambling.

But these requirements are only a starting point for us: we already go beyond them and, by applying our Playing Safe principles, are going further still.



### Licensed and well-trained employees supervise casino gambling

The casino sector is unique in the gambling industry for the number of licensed gaming staff we employ in our premises and for the special social responsibility training they receive.

There are on average around 100 members of staff in each of our casinos, with some larger clubs employing more than 500 people. Staff numbers are increasing as operators offer a wider choice of gaming and non-gaming entertainment.

Casinos have the highest ratio of licence-holding staff to premises of any gambling sector. Some larger operations have multiple Gambling Commission Personal Functional Licence (PFL) and Personal Management Licence (PML) holders on duty at all times. This means that casino gambling is both delivered and physically supervised by well-trained and experienced staff, skilled in identifying problem gambling issues and reacting appropriately.

All casino gaming staff must hold either a PFL or a PML. All other customer-facing staff, including our marketing and food and beverage staff members, must also receive annual training in their obligations regarding responsible gaming.

Compliance with training requirements, along with our other social responsibility measures, is rigorously enforced by company Compliance Officers. Failing to properly train staff puts an operator at risk of regulatory sanction by the Gambling Commission.

### Accreditation from professional care providers

Validating our confidence in our own customer care measures is important to us. So, although not a statutory requirement, all major casino operators seek accreditation from professional care providers such as GamCare, the pre-eminent charity organisation involved with responsible gambling issues. They do this to ensure they are offering



gambling in a responsible way with appropriate levels of protection for the young and the vulnerable.

Accreditation is only achieved if operators can demonstrate a real and visible commitment to responsible gambling practices. This includes procedures and signs to challenge and exclude anyone who appears to be under age or self-excluded, and the provision of information on responsible gambling and our training standards.

All the major casino operators have such accreditation.

### Self-exclusion schemes help customers to help themselves

All NCF member companies have voluntary self-exclusion schemes (VSE). These schemes enable customers who perceive they have a problem with their gambling to exclude themselves from a casino. As the name implies, voluntary self-exclusion requires the customer to take some personal responsibility for his or her actions.

Where a casino is part of a group, the exclusion usually applies in other casinos run by the same operator.

However, VSE schemes vary between companies and currently there is no mechanism that allows customer information to be shared between operators.

Although self-excluding customers are advised to protect themselves by joining multiple VSE schemes, we know this does not always happen. We are going to see if we can improve this system.



### Promoting and supporting research, education and treatment

We were the first sector in the industry to recognise the importance of providing support for people who have problems associated with gambling. Casino operators were the founding voluntary contributors to a charitable trust that supports research, education and treatment for problem gamblers.

Making a voluntary contribution to research, education and treatment of problem gamblers has been a prerequisite of membership of our industry's principle trade association for more than 20 years.

The Licence Conditions and Codes of Practice (2.1) now require operators to demonstrate their contribution.

In the main, operators meet this obligation by making an agreed voluntary contribution to the Responsible Gambling Trust. This Trust, together with the Gambling Commission's Responsible Gambling Strategy Board, decides how the contributions should be distributed and has in place mechanisms and measures to ensure we understand their impacts.

Some companies work closely with health and care agencies local to their operations.

### Sharing best practice via a Social Responsibility Forum

NCF has a quarterly Social Responsibility Forum. Membership is restricted to representatives of the operating casino companies in NCF membership.

The forum meets to share best practice on social responsibility issues and to hear from the regulator, academics and researchers.



# CUSTOMER FOCUS

'We know our customers personally...'

Knowing customers personally is part of the unique service and experience that we offer in British casinos. We see our customers face to face. We know many of them very well and are doing more to know them better. This makes good commercial sense for us but it also provides opportunities to spot changes in behaviour that might indicate an emerging problem.

One conventional source of customer data, widely used by other consumer-facing businesses to understand spend and preference, is not available to us. Because the use of credit cards is prohibited in all land-based casinos (they can be used online), we rely on our loyalty and membership cards to gather important insights. Our loyalty schemes play a key role in helping us know our customers and we will work to use the information to improve our understanding of player behaviour.

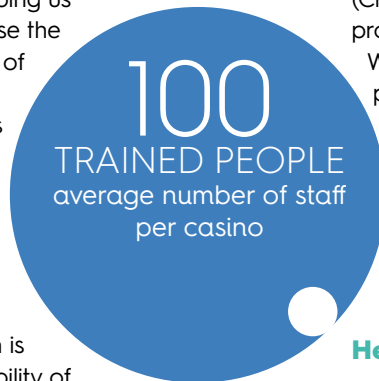
Apart from the commercial opportunities these loyalty cards give us to communicate with our customers, they also enable us to operate robust age verification systems.

Some of the products we offer, such as gaming machines, already capture data automatically. In the main this information is used to assess the performance and reliability of the device and currently there are technical limitations on what else we can do with it. However, the industry is committed to examining how that data can be linked with what we know about an individual customer to better understand player behaviour.

We will work with manufacturers and suppliers to ensure that responsible gambling objectives are fundamental to design innovation.

## Making sure young people are excluded

All casinos have trained receptionists and door staff dedicated to ensuring that people who should not come in are prevented from doing so.



We operate a rigorous Challenge 21 policy (Challenge 25 in Scotland) and display clear signs prohibiting entry by people under the age of 18.

We also collect information about how many people we turn away, so we know how vigilant we need to be.

Our effectiveness in preventing under-age gambling in UK casinos is excellent and has earned us an enviable domestic and international reputation for protecting the young.

## Helping people to gamble responsibly

We provide information online about responsible gambling on our websites and in all our casinos in formats and languages accessible to our customers, including pamphlets and electronic information on gambling products such as slot machines and roulette terminals.

In our premises we offer information both overtly and discreetly, so people seeking it can avoid any personal embarrassment.

Some larger operations also have responsible gambling ambassadors whose role is actively to promote the responsible gambling facets of the operation.

'We also encourage players with problems to seek advice and help from Gamcare.'

# WHAT WE WILL DO NEXT

Core principles: Defined for the first time

**N**CF members have created Playing Safe as a statement of the principles by which we operate and which underpin responsible growth and innovation in the industry.

Playing Safe is an open statement of our core values and the principles by which our members are prepared to be judged and held to account by our customers and our regulator.

At the heart of these principles is the direction set by the Responsible Gambling Strategy Board which we wholeheartedly support.

Playing Safe is a call to action to change the way we promote responsible gambling.

Accepting Playing Safe as the right way to do business is at the centre of NCF's policy agenda.

## Our new forum will promote responsible gambling in every casino

We will restructure, rebrand and re-launch the NCF Social Responsibility Forum as the Playing Safe Forum (PSF) with an ambitious expanded mandate and mechanisms for measuring its success.

All members of NCF have agreed to operate according to the Playing Safe principles for responsible gambling, although we do not prescribe a single PSF format. Delivery may differ from company to company or even between premises, but every company's policies will encompass the core principles established and promoted by the PSF.

The Playing Safe Forum will be open to ALL casino operators regardless of NCF membership.

The PSF will manage and evolve the core policies through regular meetings of a structured group of professionals representing operators, manufacturers, the regulator, the care service agencies, health care professionals and academics. This will ensure a broad and informed dialogue on responsible gambling.



## The Playing Safe Forum will:

- Drive the development of a National Voluntary Self-Exclusion Policy and measure the outcomes to make sure it works
- Drive the National Young Mystery Shopper Policy and measure the results to ensure we are the best we can be
- Give operators the information they need to deliver consistently responsible gambling in agreement with the principles
- Help people to be better informed about their machine gambling
- Provide example templates for all messages about responsible gambling in printed material and on machines and electronic gaming products
- Act as the gateway to the casino industry for the public health, care and research communities
- Actively work with suppliers to ensure the industry's responsible gambling requirements are understood and met
- Evaluate and confirm product risk assessments

## And to make sure our industry is getting things right, the PSF will:

- Develop metrics and assessment tools to measure the effectiveness of staff training
- Develop metrics to measure the impacts of changes to machines stakes, prizes and numbers of products
- Collect operators' experiences of responsible gambling and share lessons across the casino sector and with the wider industry
- Establish an industry standard metric for baseline monitoring of changes to product offerings
- Monitor international developments and research and keep the industry up to date



### We are working to make self-exclusion more effective

The current company-based voluntary self-exclusion schemes work well and operators work hard to help people who have self-excluded stay away from their casinos.

But these schemes have limitations. For example, where there are a number of casino operators in the same area, some customers might be better served by a scheme with broader cross-company reach. Of course, other gambling opportunities outside casinos are also available.

Casino industry members of NCF are now looking to set-up a *National Voluntary Self-Exclusion Scheme* (NVSE) open to any casino operator.

We are mindful that any casino-based NVSE scheme will not preclude a self-excluded person visiting some other gambling establishment or playing online. Our intention therefore is to start an industry-wide dialogue on the development of the scheme once we have established the pilot.

The scheme would aim to share data on individuals who have requested self-exclusion on a national basis. The initial framework of the scheme is set out below.

A pilot scheme involving two different operators on the same Facial Recognition Technology (FRT) platform was started by the NCF Social Responsibility Forum in May 2013. FRT offers significant opportunities in relation to a national self-exclusion scheme and the Playing Safe Forum will work with manufacturers to develop

reliable and effective products.

The next step will be to try to integrate a company using a different technical platform. The technical, legal and commercial complexities of this project are considerable but we are determined to see what can be achieved.

### How the National Voluntary Self-Exclusion Scheme would work

- The NVSE scheme will be operated by an independent third party provider
- It will be open to all casino operators (not just NCF members) with direct entry via the independent provider
- The NVSE provider will make available a list of participating casinos
- NVSE will establish agreed protocols for removing the individual from cross-marketing and banning him or her from entry to member casinos
- Protocols for de-barring someone to be agreed
- NCF will partner with service providers to develop a sector-specific training package
- The intention is to broaden off-site customer access to the NVSE and make self-exclusion available via treatment providers
- National self-exclusion will require:
  - The applicant to have signed an industry standardised NVSE form, allowing personal data to be shared
  - The PML holder to ensure that the applicant understands that he/she is seeking NVSE for 'problem gambling', and to be satisfied that admission to the scheme is appropriate
  - The holder of a PML to approve the application

SHARING PLAYER PROTECTION EXPERIENCE ACROSS OUR SECTOR



### We will maintain our exemplary record in preventing under-age gambling

Casinos have an exemplary record in preventing under-age gaming. However, to ensure standards are maintained and further monitored, members of NCF have agreed to implement a National Young Mystery Shopper programme.

Under the scheme, every casino belonging to NCF members will be tested for its measures to prevent under-18s from gaining entry.

We have also made the scheme open and accessible to all casino operators, regardless of full NCF membership.

Data will be shared with the individual operators and The Gambling Commission.



20+  
YEARS  
voluntary support for  
responsible gambling

### We aim to give customers better information about comparative risk

The majority of people who gamble do so without experiencing any gambling-related problem. However, for a small minority of the people who gamble and have difficulty controlling their gambling, the products the industry offers may have some inherent risk of harm.

Risk is intrinsic to gambling and a key element in making gambling fun and exciting. Removing all risk from gambling products is neither achievable nor desirable. The industry wants to better understand risk so it is better equipped to inform customers about the comparative levels of risk they accept when playing on different gambling products.

Our objective is to mitigate harm without removing the fun.

The industry will work with the Responsible Gambling Strategy Board, the Responsible Gambling Trust and other specialists to try to establish a risk assessment process for determining

THINK 21  
a national  
scheme to test  
our controls

the degree of risk attached to a product and any appropriate mitigation measures that might be applied. This would apply to all existing products and new ones as they come to market.

Our ambition is to establish a simple and effective method of informing customers about the risk profile associated with each of the products we offer.

If we are successful the PSF will offer advice and make recommendations to operators about any messaging or marketing constraints that might need to be attached to the product, and the way in which the product should be offered and supervised.

We will monitor data produced by products and work to correlate it with data on problems the products may cause.

### Getting the message across loud and clear

Our industry will use modern ways to deliver the responsible gambling message.

We will deliver it in the most appropriate manner,



particularly for groups identified in the British Gambling Prevalence Study as being ‘vulnerable’. We have worked with NatCen Social Research to better understand the demographics of our customers and we are adapting the language we use to make the messages clearly understood.

We will create and implement Quick Reader (QR) codes and display these on all printed material and in casino premises, allowing customers with smart phones to access information on responsible gambling discreetly without having to pick up a leaflet or other written material. The QR links will offer direct links to company sites or, for smaller operators, links to an NCF-operated site with generic information. The QR reader will advertise the national helpline free-phone number.

We will also use social media, such as Twitter, Facebook and LinkedIn, to deliver the message.

As products and information technology (IT) evolve, the industry pledges to ensure that responsible gambling messaging is available in all forms.

In whatever way the message is delivered, it will offer information about personal strategies that allow individuals to decide how to gamble responsibly.

### **Taking steps to improve player awareness**

We already offer some real-time information to players. Our machines remind players they should know when to stop and we advertise GamCare on all our machine products. We will also be displaying the free national helpline number.

Our ambition is that as new products are offered and standards evolve, we will explore with manufacturers how we can offer players more



information about the length of time they have been playing.

Any incremental increase in the availability of more modern products will enable operators to give players better information to raise their awareness of their gambling activity.

We will work with manufacturers with a view to developing relevant technology.

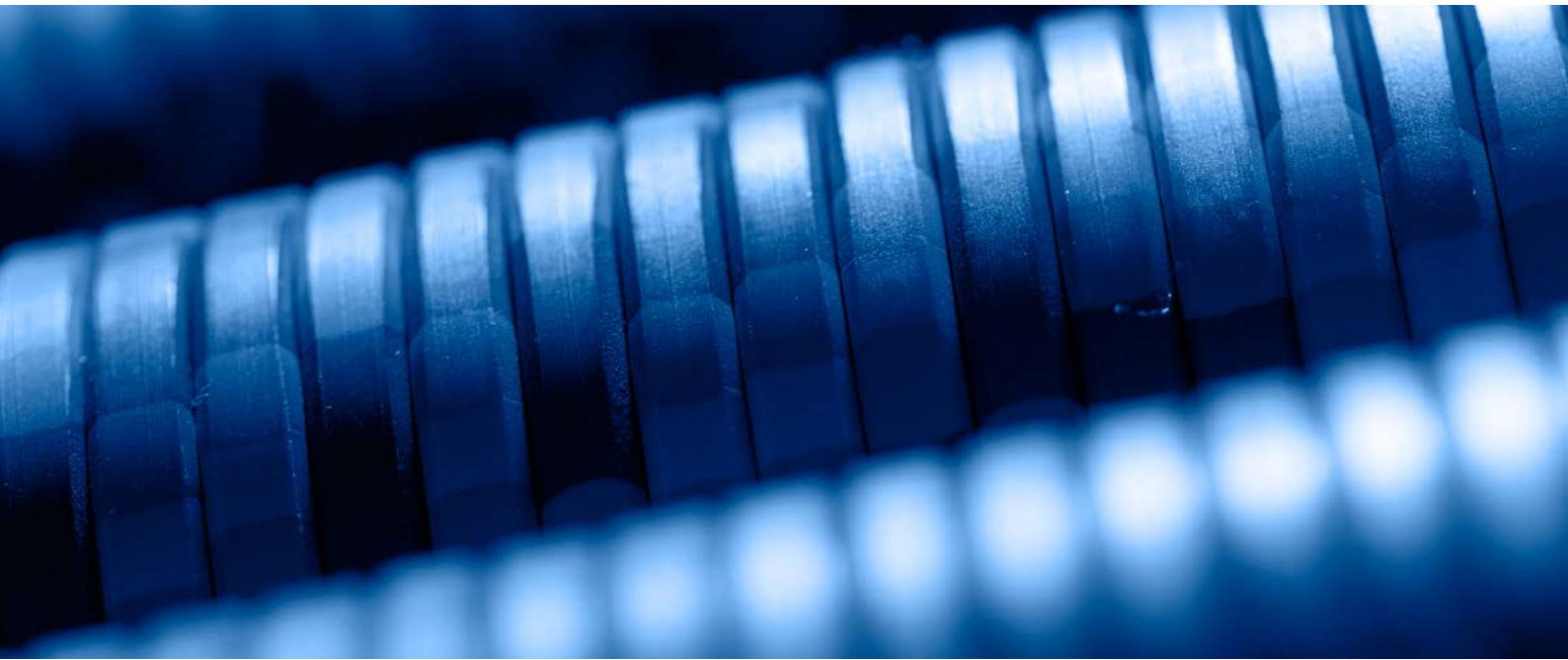
### **We want to lead the industry in protecting players**

We recognise both the commercial and social value of having a much better understanding of the effects of gaming machines on the people who play them and we want to lead the industry in the field of player protection.

But we need data to broaden our understanding of players in British casinos. Restrictions on the number and style of machines that casinos are allowed to operate in the UK makes it extremely difficult to collect the kind of data we need in the volume we need it.

Less than 1% of the 250,000 gaming machines in the UK are in casinos, which severely limits our ability to influence manufacturers to adjust specifications or develop effective player-centric technologies on the products we are allowed to offer our customers.

So we are looking at work in other jurisdictions. Internationally, many casinos have very large numbers of machines; some have more in a single casino than are found in the entire UK casino estate. While large machine parks and server-based machines provide an immense amount of data, most of it is not player-related and offers only



limited insight into an individual's play or propensity for developing problems with machine gambling. However, the amount of data available may provide an opportunity for research that is simply not open to us within the UK casino industry. With that in mind we are carefully monitoring international research.

We have also looked carefully at online gaming and the tools currently available in other jurisdictions to supervise play on electronic wagering opportunities. In the online sector the use of credit and debit cards means that initial player identification does not rely on either a loyalty programme or face to face identification. However, at present there are no algorithms that identify aberrant behaviour or predict problem gambling per se. Research to date indicates it is unlikely that player monitoring via the machine data in real time can be used effectively to mitigate gambling-related harm.

We are not complacent. We are examining whether the limited machine data currently available could be read alongside data from loyalty programmes to develop more useful player profiling techniques. Where we are able to gather useful data - the kind currently used for marketing - we will carefully examine how it may be used to flag potential problems to trained staff with the ability to engage with the player.

While effective technology-based systems remain



in development and are limited in scope, physical observation of the player remains the best way to identify problem gambling. Overt signs of distress, anger or aggression towards the machine are recognised worldwide as the most useful indicators that intervention may be required.

Sometimes aberrant behaviour, which could signal that a player has a problem, might be less easily recognisable. We are examining how we deal with customers who draw attention to themselves by their conduct to ensure that events routinely characterised as 'security incidents' are also considered as possible indicators of problem gambling.

With expert guidance from major care service providers, we will develop a specialist training course for machine supervisors and ensure that all incidents are appropriately screened for problem gambling.

We will also ensure that a suitably trained individual is available in casinos where the maximum machines allowances are available.

**The Playing Safe Forum will continually engage with the Responsible Gambling Trust, the Responsible Gambling Strategy Board, the regulator, legislator and the wider machine industry to try to bring about positive player-centric change.**

Playing Safe™

WE WILL WORK WITH  
MANUFACTURERS  
TO DEVELOP  
PROTECTIVE  
TECHNOLOGY





National  
Casino  
Forum



**National Casino Forum**  
Carlyle House  
235-237 Vauxhall Bridge Road  
London SW1V 1EJ  
**Tel** +44 (0) 207 828 5410