



PLAYING SAFE

ONE YEAR ON



Innovating
Responsible
Gambling

CHAIRMAN'S SUMMARY

A year on, the Playing Safe principles now define the way the UK casino industry conducts its business. Through the Playing Safe Forum we have set the agenda for the only industry-led responsible gambling programme in the UK. The casino sector, represented by the National Casino Forum, has achieved this by making responsible gambling a strategic issue requiring the direct engagement of business leaders. Responsible gambling is firmly on the corporate agenda as a key business performance indicator.

Playing Safe projects are driven through an open forum attended by representatives of the industry, the regulator, the Department for Culture, Media and Sport, the Responsible Gambling Trust, academics and others who make a contribution on specific topics. It comes as no surprise to us that the projects undertaken through the Playing Safe Forum are now being recognised as having broader application across the wider gambling industry and are reflected in the current licence conditions and codes of practice consultation as well as in the initiatives now being undertaken by other sectors. We are proud to have taken the lead and intend to remain in the vanguard.

This second edition of the Playing Safe brochure

outlines some of the work we are undertaking on major projects; it is neither a comprehensive nor exhaustive account.

No matter how much effort and resource the industry commits to Playing Safe, ensuring that the UK casino sector balances profitability and social responsibility is not something the industry can achieve alone. Even with the support of the regulator, we will not be able to develop the industry the public deserves or the opportunities for growth and innovation that the Chairman of the Gambling Commission has suggested are achievable. The government must play its part.

The long term success of Playing Safe is dependent on both a tripartite commitment between the industry, the regulator and the government, and a regulatory framework that treats the industry fairly and allows it to prosper safely.

I hope the industry's commitment is evident in the work of the Playing Safe forum.

Roy A C Ramm
Chairman



Innovating
Responsible
Gambling

CONTENTS

CHAIRMAN'S SUMMARY	2
KEY FOCUS	
SENSE	5
CORE CODE OF PRACTICE - SEVEN CORE ELEMENTS	7
CUSTOMER FOCUS	
FOCAL RESEARCH	18
MARKET FORCE	19
ACCREDITATION CERTIFICATION AND EVALUATION (ACE)	19



KEY FOCUS

Self-Enrolment National Self-Exclusion - SENSE

The NCF was formed with the overriding aim of promoting a positive agenda for a well regulated, socially responsible and commercially successful casino industry. NCF members are committed to promoting socially responsible gambling and provide confidence to the public, government and the regulator (The Gambling Commission) in the way the industry conducts its business.

Under the umbrella of Playing Safe, the NCF's cornerstone commitment to improving social responsibility and improved player protection, the SENSE (Self-Enrolment - National Self-Exclusion) system is intended to offer a facility to those people who have acknowledged they have a problem with their gambling and want to voluntarily exclude themselves from casinos.

NCF's Playing Safe programme is now delivering major change. This is a world first: the first time that non-state-owned casino operators have come together to implement a national self-exclusion scheme.



What is SENSE?

SENSE allows people who believe they have a problem with their gambling to voluntarily enrol in a scheme to exclude themselves nationally from all land-based casinos in the UK.

How does it work?

Customers who ask to exclude from a casino because of gambling problems will be asked to join SENSE. The exclusion information will then be extended to all NCF member casinos.

For the first time care service providers will be able to add an individual's details directly to a self-exclusion database.

The SENSE system will circulate photographs and biographical information, as well as interface with companies' loyalty cards, vouchers and other

marketing tools to allow automatic checks to be made of the central system to identify self-excluders who may breach the agreement.

Information about self-excluders will only be searchable by registered users and will be proactively circulated to casinos operated by different companies in the same area.

Under the scheme, players wishing to self-exclude will, for the first time, be able to do so from any of the UK's casinos.





CORE CODE OF PRACTICE ON RESPONSIBLE GAMBLING

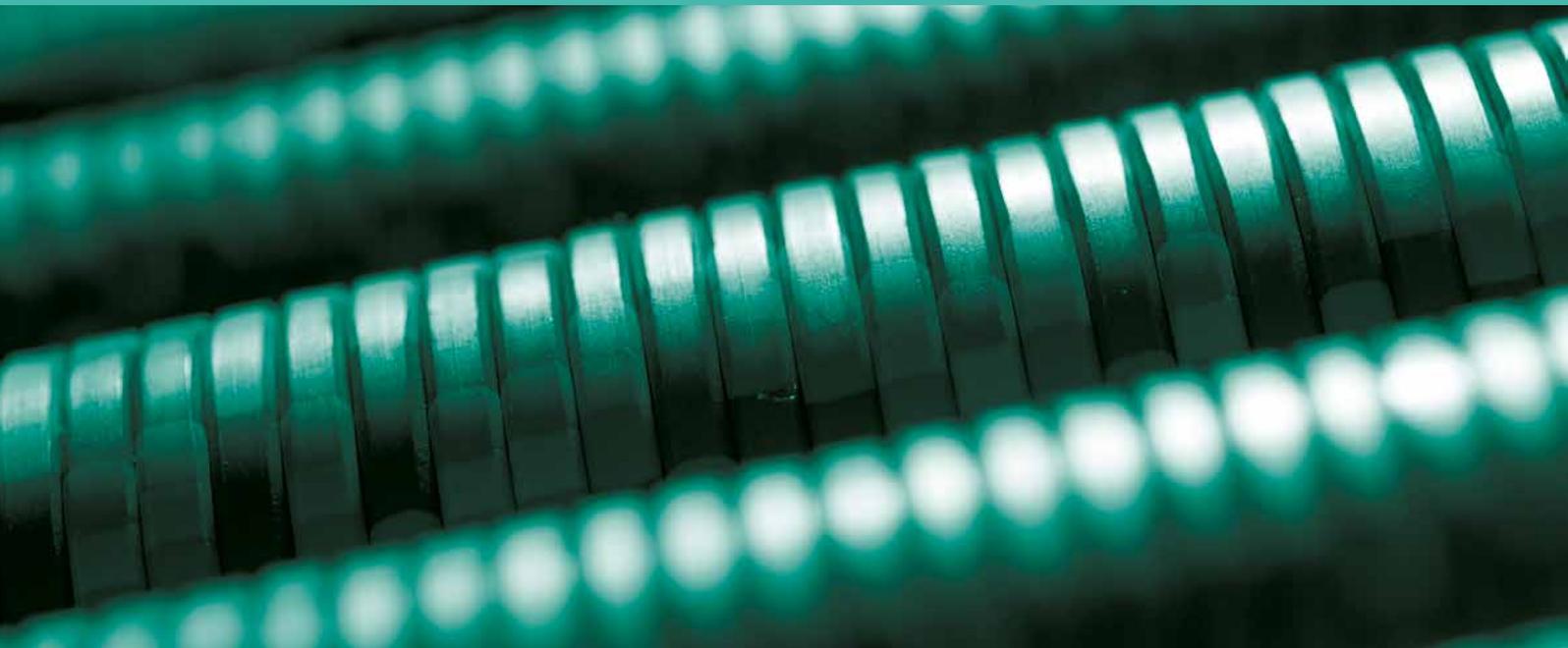
Gambling is widely recognised and accepted as a legitimate and popular adult leisure activity that most people enjoy without experiencing any problems. The objective of the Playing Safe principles is to help operators deliver their gambling products responsibly while continuing to grow and bring innovation to their businesses.

Most casino operating companies already have effective company-specific social responsibility codes, which, as a minimum, encompass the legislative requirements of the Gambling Act 2005, the Social Responsibility elements of the Gambling Commission's Licence Conditions and Codes of Practice (LCCP) and the requirements of the codes on advertising produced by the Committees on Advertising Practices (CAP and BCAP). A number of predominantly, but

by no means exclusively, larger companies go beyond the minimum required with innovative ideas to offer greater levels of protection to customers.

The Playing Safe Core Code identifies the relevant statutory requirements and regulations by which the industry must abide, draws best practice from the company-specific schemes the NCF has reviewed, and offers a basic core code which all members should find helpful in offering effective player protections. Where appropriate, some examples of the practical application of responsible gambling policies are also offered.

The Playing Safe Code can be implemented in place of any existing company code, or an existing company code can be assessed against it by the Playing Safe Accreditation Panel (ACE) and receive the Playing Safe Seal as endorsement of the code.





SEVEN CORE ELEMENTS

For most people gambling in all its forms is a leisure activity that offers a degree of excitement and entertainment: for a minority gambling can become a problem, causing harm to the gambler and to the families and people closest to them. Responsible operators of gambling companies recognise those dangers and work to mitigate them.

Built on seven core elements, the code is primarily intended to help casino operators who are members of the National Casino Forum to develop their individual responsible gambling policies.

The code can also be adopted by an operator as a complete SR code without any adaptation.

The code is intended to help suppliers and developers of gambling products to understand the criteria by which their products are likely to be measured.

The code is intended to help the people employed in the industry to understand the importance of responsible gambling policy in guiding their behaviour.

Finally, the code is intended as a clear statement to our customers and regulators that the industry takes seriously its responsibilities to mitigate the risks associated with gambling.

- 1 Responsible Gambling Culture and Governance
- 2 Protecting Children and Young People
- 3 Protecting the Vulnerable **SENSE** (Self-Enrolment National Self-Exclusion)
- 4 Advice and Information for Customers
- 5 Customer Interactions
- 6 Marketing and Advertising
- 7 Training and Development



1 RESPONSIBLE GAMBLING CULTURE AND GOVERNANCE

Directors and managers will be advocates for responsible gambling and will work to embed a culture of responsible gambling in their organisations

1.1 All casino operators must recognise their duty of care to all customers and have procedures in place to recognise and assist those customers who may have, or are at risk from developing, a problem controlling their gambling. They must demonstrably commit to implementing responsible gambling policies and practices intended to deliver an appropriate and fair commercial balance between maximising enjoyment from gambling and minimising any harm it may cause.

1.2 Directors and other senior managers of companies must be able to demonstrate that they recognise the importance of promoting responsible gambling and are advocates and influencers for a responsible gambling (RG) culture within their organisation.

1.3 There is a statutory requirement on companies to contribute to research, education and the treatment of problem gamblers (LCCP Social Responsibility Code Provision 3.1.1.2 – See Appendix A)*. Operators are also required as a condition of their operating licence to disclose to the Gambling Commission via their quarterly regulatory returns how this has been achieved.

Third Sector Engagement

1.4 Beyond any statutory requirement, operators should consider engaging with, supporting and encouraging the work of any local organisations that address the social impact of gambling through their research, intervention or treatment programmes.

* LCCP codes are subject to change, please refer to most recent publication

Practical applications

- A designated director should be responsible for overseeing the company's responsible gambling policies and implementation
- Information about responsible gambling should routinely form part of board and senior management agendas alongside financial performance and other strategic information
- The impact of any changes in the business or the introduction of new products should be evaluated in the context of responsible gambling 'How will this impact on our more vulnerable or at-risk customers and how can we mitigate that impact?'
- Companies should ensure that senior managers understand the trends of self-exclusion
- Self-exclusion logs should be regularly reviewed alongside responsible gambling information
- Responsible gambling logs should be routinely inspected by senior managers
- Information about the number and nature of incidents that might be related to customers having problems with their gambling should be collated and discussed along with any business changes required to attempt to identify any causal connection
- Excellence should be expected and, to encourage awareness amongst peers, exceptional performance should be rewarded, e.g. spotting breaches of VSE or identifying the misuse of identification documents by a young person
- Information should be shared (within the legal constraints of data protection legislation) and bona fide research projects should be undertaken to provide anonymised data that might help improve the understanding of gambling
- Companies should adopt local RG charities and raise funds on their behalf.



2 PROTECTING CHILDREN AND YOUNG PEOPLE

We will protect children and young people by ensuring that both gaming and non-gaming staff accept their responsibility to prevent their entry to the casino

2.1 Keeping 'children and young people under the age of 18 years' out of casinos is a statutory requirement.

2.2 It is a mandatory licence condition for most premises that all entrances to casinos must be clearly signed that entry by people under the age of 18 is prohibited.

2.3 The LCCP requires that all staff be trained to challenge any person they see on the premises, if they believe the person may be under the age of 21 regardless of whether they are engaged in gaming or not (LCCP SR CP 3.2.1).

2.4 It is important for all staff to understand that responsibility for keeping young people out of casinos is shared and is not simply the job of door or reception staff. Gaming and non-gaming staff including employees engaged in serving food and beverages share the responsibility of ensuring that the customers they serve are both old enough to consume alcohol and to be on the premises.

2.5 Under the Playing Safe programme, the NCF operates an annual 'mystery shopper' programme to test the effectiveness of the measures in place to prevent entry to casinos by young people. Though the law does not permit NCF to use young people who are actually under 18, NCF contracts professional market testing organisations to provide individuals who are over 18 but look younger... They will attempt to enter unannounced and therefore should be subject to challenge.



Practical applications

- Check that notices are prominently displayed at points of entry and are not defaced or obscured
- Check sight-lines in reception areas to minimise undetected entry
- Ensure that 'front line' staff in reception are not unduly distracted by other duties
- Promote and test staff awareness
- Review any relevant CCTV coverage to determine if breaches of conduct by staff occurred which contributed to a young (or excluded) person gaining entry
- The advertising of casino gambling or gambling products should never be targeted at children.

This applies equally to sponsorship and the code requires that gambling operators will not allow their logos or other promotional material to appear on any commercial merchandising which is designed for use by children.

2.6 When failures are reported through the testing process, operators are asked by NCF to examine why entry was gained to determine what remedial action can be taken to improve the entry processes at the premises.

2.7 Where breaches of conduct by staff are detected that result in a risk of entry being gained by a child or young person, operators should consider sharing the outcome of any enquiry and/or any disciplinary proceedings within their organisation to demonstrate the seriousness the organisation attaches to such breaches and the potential failure to protect a child or young person.



3 PROTECTING THE VULNERABLE

We will help those who have problems with their gambling to exclude themselves from casinos by offering enrolment in a national voluntary self-exclusion scheme SENSE (Self-Enrolment National Self-Exclusion)

3.1 The 2005 Gambling Act requires us to protect 'other vulnerable persons'. This is generally accepted to mean people who have problems controlling their gambling.

3.2 All casino operators are required to operate a voluntary self-exclusion scheme. In 2015 the NCF will introduce SENSE, a national voluntary self-exclusion scheme, which will replace company-based self-exclusion schemes.

3.3 Customers wishing to self-exclude from all NCF member casinos in the UK because they have a problem with their gambling will be given the option to exclude themselves through the SENSE scheme.

3.4 Where a customer declines to join the SENSE scheme, an operator may agree or proactively choose to bar the customer locally through the operator's local barring scheme. The operation of local barring schemes may vary, but it is important that the customer understands the differences between national self-exclusion through the SENSE scheme and the local barring scheme.

3.5 Local barring schemes used for responsible gambling reasons will implement the LCCP standard for self-exclusion. The information regarding the numbers of self-excluders, age, gender, breaches and attempted breaches and resignation from local barring schemes will be shared with the NCF to help monitor the public appetite for the SENSE system.

Enrolment in SENSE

3.6 The SENSE self-exclusion procedure will be clearly explained by the holder of a Personal Management Licence (PML) to any customer requesting to self-exclude and they will be asked to sign to acknowledge their acceptance of the conditions.

3.7 Designated care service providers e.g. GamCare, Gordon Moody Association and the National Problem Gambling Clinic (CNWL) will have access only to enrol clients onto the SENSE system.

3.8 Written requests for self-exclusion will be acknowledged in writing as soon as practicable.

3.9 The customer will be made aware that self-exclusion cannot be withdrawn within six months and will remain in place after the six-month period has expired until they ask for reinstatement.

3.10 Customers will not be notified when the six-month minimum exclusion period has been met.

3.11 Customers will be told that any memberships they held prior to joining SENSE will not automatically be reinstated.

3.12 A customer who has self-excluded through SENSE will be removed from all marketing databases and will not receive any promotional communications.



Practical applications

- Casino management systems will have automatic protocol interfaces with the SENSE database to identify people who attempt to or breach their exclusion
- Photographs of excluders will be immediately circulated to all casinos locally or in 'peer groups'
- Only registered users who have a PIN will be able to access the SENSE database
- Only devices (pads and PCs) registered to the SENSE database will give access to the PIN holder
- Data on SENSE will ONLY be searchable in a casino
- Casino operators need to ensure that they are proactively engaged with the SENSE programme and comply with its protocols.

Personal responsibility

3.13 Though the principal responsibility remains with the self-excluded customer not to enter any casino, operators must be able to demonstrate that every effort is made to use the facilities and features of the SENSE system to prevent customers who have enrolled attempting to enter and play in a casino.

Withdrawal and reinstatement

3.14 The request to reverse a SENSE exclusion will only be considered after the minimum six month period has passed.

3.15 After the six month exclusion period has passed, customers requesting reinstatement will only be considered after a minimum 24 hour 'cooling off' period, and whose SENSE activity data has been reviewed will then be interviewed by a suitably trained manager (PML holder) before being readmitted into the casino.





4 ADVICE AND INFORMATION FOR CUSTOMERS

The advice and information we provide to customers will be clear, truthful, fair and socially responsible and will not misrepresent the risks associated with gambling

Advice to customers – fair and open

4.1 Like all companies offering products in a retail environment, it is entirely legitimate for casinos to offer advice to customers about their gaming products. Any advice given must be objective, fair and honest.

4.2 It is a requirement of both the casino's mandatory premises licence conditions and a LCCP SR Code Provision that the contractual terms under which gaming activities are conducted are not unfair and are made available to customers in plain and intelligible language. The casino must also abide by its own rules. (LCCP SR CP).

4.3 Similarly it is a requirement for the rules of the games on offer to be made available to customers, together with the house edge on those games, to

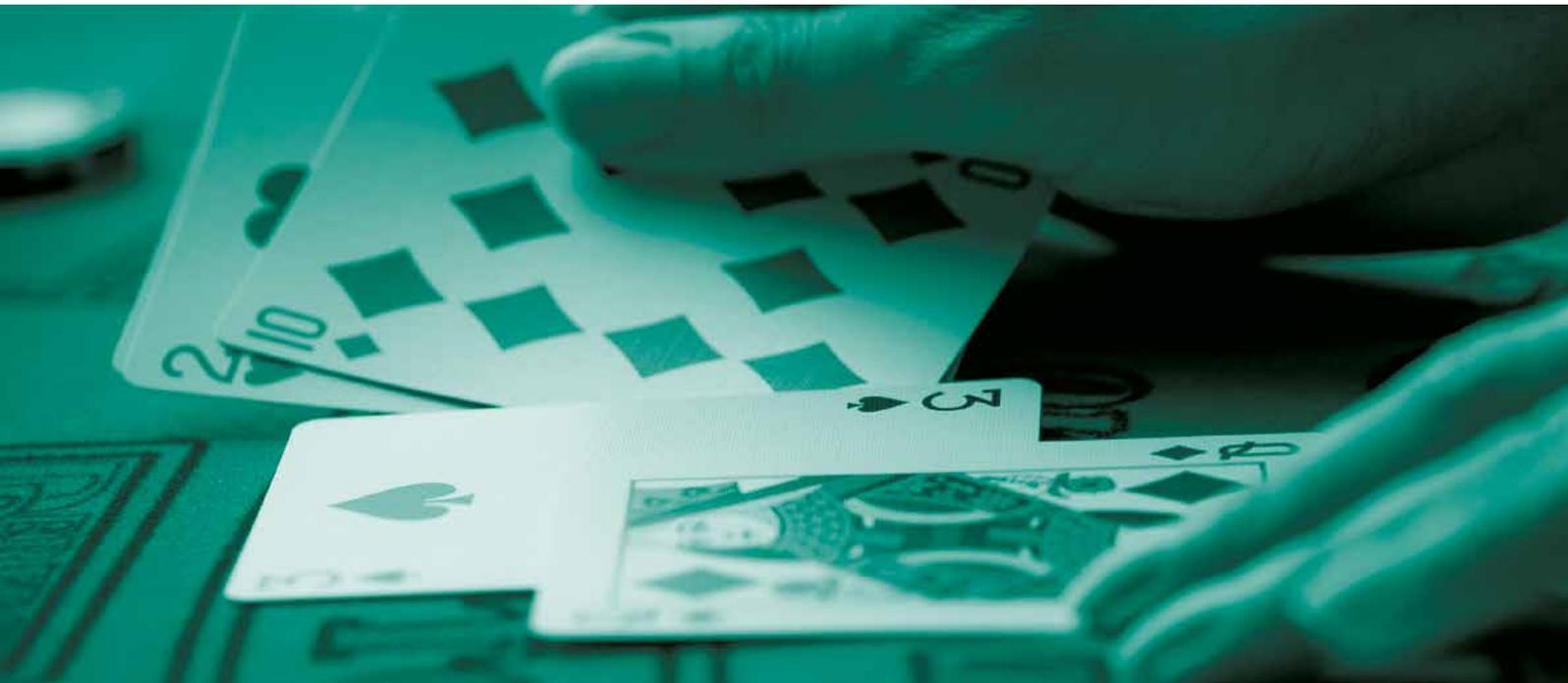
assist customers in making an informed choice about what games they want to play. (LCCP SR CP).

4.4 It is important that available advice is socially responsible and does not encourage customers to spend more than they can afford or give any false expectation of winning.

4.5 Operators should consider whether it is possible to offer information about the 'return to player' on gaming machines, including offering information about the ratio between the size and frequency of jackpot wins.

Advice on how to gamble responsibly

4.6 Through Playing Safe, NCF members have committed to provide environments in which customers are encouraged to gamble responsibly.



The LCCP (3.3.1) requires that responsible gambling messages are displayed on posters, electronic displays and leaflets which will always be available in both prominent and discreet places in all casinos, including in the reception area, gambling floor area and toilets.

4.7 These leaflets outline some of the characteristics of problem gambling and carry information about referral organizations, a telephone helpline number and information about the self-exclusion policy.

4.8 The National Gambling Helpline operated by GamCare must also be displayed on all on-site automatic teller machines (ATMs) or any other machine for obtaining funds for play, and on gaming machines.

4.9 Information about responsible gambling must also be available in the languages used in marketing and advertising material.

Practical applications

- Customers must NOT be encouraged to:
 - Re-stake their winnings
 - Chase their losses to recoup money already wagered
 - Continue to play when they have indicated that they wish to stop
- Casino operators should consider including how this process can become a documented part of company protocols
- Operators should ensure that manufacturers and suppliers are aware of the industry's obligations to provide better information to players, to ensure that the products offered are compliant with any regulatory requirement in respect of player information
- Operators should encourage manufacturers and other gambling service providers to make information to players more accessible
- Operators should conduct their own social responsibility risk assessment of any new gaming product offered to their customers.

5 CUSTOMER INTERACTIONS

We will interact with customers whose behaviour may indicate they have a problem with their gambling

5.1 Operators must put into place policies and procedures for customer interactions where members of staff have concerns that a customer's behaviour may indicate problem gambling. (LCCP SR CP 3.4.1).

5.2 There is also a general duty of care to customers which means that operators should not ignore any signs of distress exhibited by any person on the premises. However, spending some time in a casino can sometimes be chosen as a deliberate distraction from other non-gambling-related issues that are the cause of the distress.

5.3 In particular, during financial transactions, operators must be able to demonstrate that they have mechanisms in place to bring to the attention of the holder of a Personal Management Licence (PML) any conduct observed by cashiers that might give rise to concerns that a customer is experiencing problems with their gambling.

5.4 Professional opinions vary about when and how interactions with customers who may be experiencing problems with their gambling should take place.



Practical applications

- Staff should be trained never to assume that because a customer is showing signs of distress, anger or other aberrant behaviours the behaviour is necessarily gambling related
- A neutral approach - perhaps offering an invitation to take a break - which allows a customer to respond appropriately, should be adopted
- When an interaction takes place a record should be made in the Responsible Gambling Log
- Staff must ensure that they are aware of how a customer who indicates they have a problem with their gambling can get help and how they may self-exclude
- A PML holder should be made aware of any interactions that take place
- The RG log should be reviewed daily to ensure both that the log is in use and to identify any necessary follow-up action
- Trigger limits can be set on the frequency of some kinds of financial transactions, e.g. repeated use of a debit card that require interaction with a PML holder
- Comments made by a player that indicate they have wagered more than they intended or are chasing losses must be entered into the log.



6 MARKETING AND ADVERTISING

We will be compliant with the law and regulations in the way we market, advertise and promote our businesses and will never target vulnerable groups or offer inappropriate incentives

6.1 Casino operators are permitted to market, advertise and promote their business. The primary source of information and guidance on advertising is contained in the codes produced by the Committee on Advertising Practices and the Broadcast Committee on Advertising, first published in August 2007.

6.2 Wherever casino advertising appears, and regardless of whether the material is broadcast or in hard or electronic copy, there are strict obligations on operators which are detailed in Section 57(4) (a-t) of the CAP code.

6.3 These codes are supplemented by the gambling industry's 2007 voluntary Code for Socially Responsible Advertising. This is designed to supplement, rather than repeat or supersede, the CAP/BCAP* rules, by providing industry standards in a very limited number of related areas, especially educational messaging, that are not covered elsewhere.

6.4 Promotions, rewards and the offer of incentives are all acceptable marketing activities.

6.5 The circumstances under which they are offered and the conditions which apply must be clearly set out and be readily accessible to those to whom they are offered. (LCCP SR CP).

6.6 Such benefits which are linked to an individual's gaming play or prospective play must be restricted as prescribed so as not to encourage irresponsible gaming by customers. (LCCP SR CP).

6.7 The terms on which operators offer free or subsidised travel and accommodation to customers to facilitate their play must not be directly linked to the level of their prospective gambling. (LCCP SR CP).

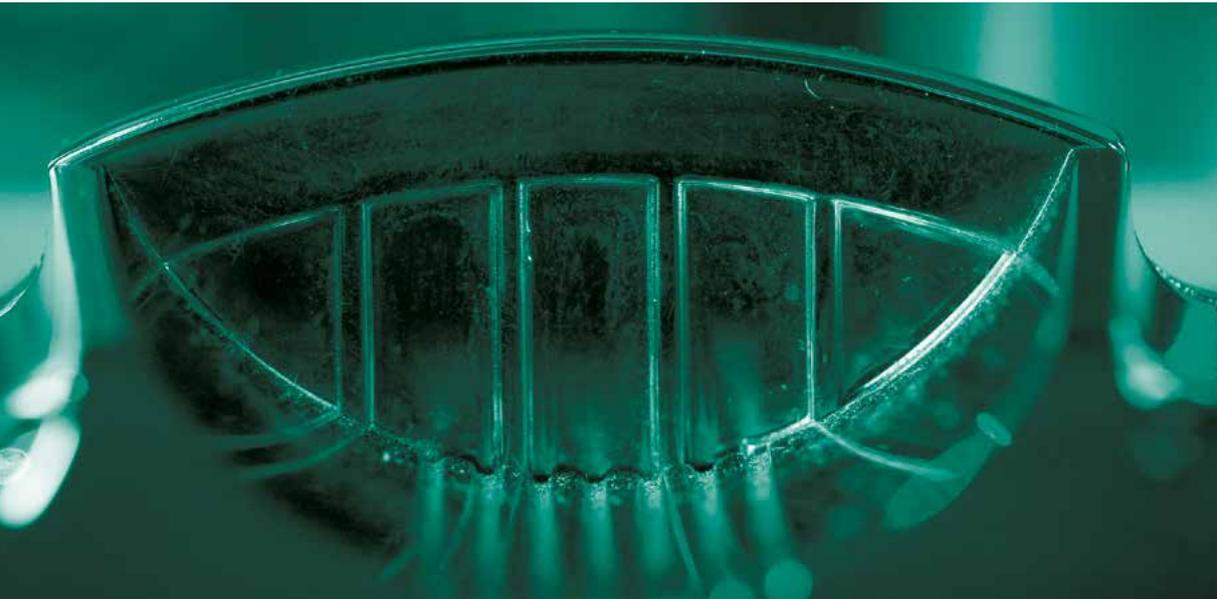
Provision of Alcoholic Drinks

6.8 Operators must not make unsolicited offers of free drinks to customers for their immediate consumption while they are gaming. Nor may they offer free or discounted drinks for customers to consume on the premises which are conditional on them gaming or continuing to do so. (LCCP SR CP).

6.9 The objectives of the Licensing Act 2003 (LA 2005 in Scotland) and the related mandatory conditions attached to a casino's premises liquor licences, contain certain social responsibility obligations for licensees.

6.10 Operators must ensure appropriate policies and procedures are in place to ensure compliance which include the training of relevant staff.

*CAP/BCAP codes are subject to change, please refer to most recent publication



Practical applications

- Operators must ensure that:
 - The copy does not breach the relevant sections of the CAP and BCAP codes (Rules 16 & Rule 17 respectively – See Appendix B)
 - The copy complies with the industry’s voluntary Code for Socially Responsible Advertising (Appendix C) by ensuring that the advertising copy carries a suitable additional tagline, such as messages encouraging responsible gambling and directing people to the National Gambling Helpline (GamCare) and other care service providers
 - As required by the voluntary code casino gambling is not advertised on television before the watershed time of 9pm
 - As mentioned in section 2 the advertising of casino gambling or gambling products is never targeted at children. This applies equally to sponsorship and the code requires that gambling operators will not allow their logos or other promotional material to appear on any commercial merchandising which is designed for use by children
 - Promotions and offers should not encourage customers to play for disproportionately more time or money than they would otherwise be expected to commit
 - All incentives and rewards must be proportionate to the type and level of a customer’s gambling
 - Promotions and rewards should not be dependent on playing for a pre-determined length of time or frequency
 - Promotions and rewards should not encourage excessive consumption of alcohol
 - Promotions and rewards should not explicitly or implicitly target more vulnerable customers
 - A system needs to be in place to ensure that these guidelines are understood and adhered to throughout the company and by any external consultants who develop promotional material.



7 TRAINING AND DEVELOPMENT

We will ensure our staff understand both the corporate culture of our organisation and their personal responsibilities in relation to responsible gambling

7.1 All members of staff should be made aware of the code of practice applicable in their casino, and their responsibilities towards it, in their basic training.

7.2 All members of customer service staff should be made aware of the importance of responding to customers who express concerns about their gambling and of the need to refer the matter to a manager if they have concerns that a customer is having problems with their gambling.

7.3 Managers are responsible for ensuring that all staff fully understand and act on their responsibilities.

7.4 Managers should be provided with additional development and training on social responsibility and problem gambling. This should include, where appropriate, training intended to enable them to intervene effectively when a customer appears to be having a problem with their gambling and guide the customer through the self-exclusion process. There should always be a member of staff on duty who has received this training.

7.5 Operators must also have in place policies and procedures to manage relationships between staff and customers to help mitigate the risk of collusion and jeopardising the licensing objectives (LCCP SR CP).

7.6 Operators must also take reasonable steps to ensure their gaming staff in particular are aware of the advice on socially responsible gaming and where they can get help and/or confidential advice should their own gambling become hard to control (LCCP SR CP).

Care Service Provider Relationships

7.7 Establishing relationships with care service providers, like GamCare, offers the opportunity for

operators to have a better and more complete understanding of the issues faced by people who have problems with their gambling to ensure training remains relevant and effective.

7.8 GamCare also offers an accreditation service which offers operators the opportunity to have an independent audit of their SR policies and standards.

Practical applications

- All staff should receive regular training that highlights the 'recognised' signs of problem gambling
- A more advanced training and development programme needs to be in place for those members of staff who need to intervene with customers who are showing signs of problem gambling
- Mentoring or coaching should be available for less experienced staff who have to intervene in difficult situations
- Training packages should be developed to ensure staff engagement and effectiveness can be measured
- The effectiveness of training and development should be regularly evaluated
- Training content should be regularly reviewed and refreshed.





CUSTOMER FOCUS

Focal Research

Measuring Player Risk and Behaviour

Members of NCF are partnering with Focal Research in a programme to examine gaming machine play in UK casinos. With funding from the National Research Council of Canada - Industrial Research Assistance Program (NRC-IRAP), Focal Research has undertaken research assessing a new method for identifying high-risk gambling patterns among casino customers. A number of the UK's major casino operators have now agreed to provide customer access and player data to Focal Research as part of this ongoing research to determine how well the method performs when applied to new markets. This next phase of the research, funded in part by NCF, is expected to be completed in October 2014, and is intended to improve our understanding of machine play and how technology

Market Force Test Purchasing (Metrics)

At the end of 2013 more than 90% of the casino industry took part in an independently administered mystery shopping exercise to test compliance with the regulatory requirement to keep young people, under the age of 18, out of casinos. The exercise, as part of the 'Think 21' challenge, delivered in its first year outcomes demonstrating the sector's strength in preventing young people from accessing casinos.

Overall, a 100% pass rate was achieved by all participating casinos. To ensure casino operations maintain this high level of adherence to 'Think 21', a next phase will continue in the fourth quarter of 2014.

The encouraging results of this exercise proved that door controls are effective even in high stress/high footfall areas where open door threshold casinos operate.



Accreditation, Certification and Evaluation (ACE)

In 2015 Playing Safe will establish an Expert Panel. The panel will help to ensure that Playing Safe projects are credible from a responsible gaming perspective and deliver the maximum benefits for operators and customers.

We expect the panel will: advise on the development of Playing Safe projects; assess their operational effectiveness; assess and endorse company responsible gaming programmes against the benchmark set by the Playing Safe Core Programme and give specific advice around the operation of the SENSE scheme.

The panel will be a valuable resource for NCF and the Playing Safe projects. It will be chaired by Professor Yvonne Guerrier.



National
Casino
Forum



TM

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