



RESPONSIBLE GAMING STANDARDS

EUROPEAN RESPONSIBLE GAMING STANDARDS

1. INTRODUCTION

European lotteries are committed to address illegal gaming and related criminal activities while at the same time minimising any potential harm on society and vulnerable groups¹ in particular by means of a controlled expansion of gaming. Education and prevention is seen at the forefront of European Lotteries' commitment to responsible gaming.

These standards have been created by the EL CSR/ Responsible Gaming Working Group and include feedback from EL Members. The objectives of the standards are:

1. To foster the continuity of public order, integrity and the fight against illegal gaming and financial irregularities as defined under European legislation
2. To identify best practice in respect of responsible gaming in the lottery sector
3. To enable EL Members to make responsible gaming an integral part of their daily operations and in doing so, to minimise harm to society.
4. To state clear rules for EL Members relating to their operations so as to:
 - ensure that the interests of players and vulnerable groups are protected (for example, excluding under-aged players, and minimizing the harm to problem gamers who continue to game)
 - ensure that relevant laws, regulations and responsibilities are met
 - develop appropriate practices taking account of relevant information and research
 - develop a better understanding of the social impact of gaming and contribute towards the on-going understanding of gambling problems

¹ The term 'vulnerable' groups can relate to different aspects of society, but in these standards means those that are below the age of legal play in any jurisdiction, those on low incomes, those that already have a gaming addiction, those who are intoxicated from drinking alcohol or taking illicit drugs, those who are sales agents, employees or contractors, and/or those that are not aware of the risks associated with problem play.



- promote the implementation of responsible gaming practices in all aspects of Members' activities, and the activities of their agents
 - provide the public with accurate and balanced information to enable informed choices to be made about their gaming activities
 - continuously improve, and report to the public and interested stakeholders on their responsible gaming programmes
5. To enable EL Members to demonstrate to society that their responsible gaming programmes are of an appropriate standard and have been independently verified.
 6. To promote a positive reputation that accurately reflects the integrity of the Member as a responsible gaming operator.

The treatment of people with gaming-related problems is the domain of therapists and other health care specialists.

Whilst EL Members are committed, where treatment services exist (see (2) vii), to collaborate with and support to service providers, the primary aim of Members is to establish Responsible Gaming Programmes to minimize the risk for all parts of society, in particular for vulnerable groups, and to promote responsible gaming among all players. These will be based on the principles of prevention and education.

The Responsible Gaming Standards were for the first time adopted by the EL General Assembly in 2007. They are supplemented by the EL Certification Framework, which was adopted by the General Assembly in June 2009. All Members shall ensure that they comply with applicable laws and local jurisdiction at all times. In order

to accommodate a rapidly changing gaming environment and new knowledge and research in the area of responsible gaming these Responsible Gaming Standards shall be reviewed regularly.

The standards are the primary element of an EL policy framework for responsible gaming; the policy framework will include other documents that supplement the standards, for example specific codes of conduct (such as the Code on Sports Betting) and the EL Certification Framework, which relate to responsible gaming practices within the EL community. The standards are designed to be complimentary to the WLA Responsible Gaming Principles and Framework, in that the EL standards specify outputs (i.e. it explains specific actions which EL Members shall take) that can be measured. It is expected that through the implementation of the EL Responsible Gaming Standards EL Members will meet Level 4 of the WLA framework. However, the EL Standards are intended, where necessary, to go beyond mere compliance with the WLA framework, as required in Europe.

This document does not substitute any applicable laws and regulations within each Member's jurisdiction, but sets standards on responsible gaming which EL Member State Lotteries commit to follow accordingly.

2. STANDARDS

I. RESEARCH

Members shall, working with appropriate stakeholders, promote (e.g. initiate / engage in / communicate the results of) research and/or studies, including from independent sources in



order to contribute to society's understanding of problem gambling.

This may include the funding of research and/or studies as well as arranging or participating in seminars, conferences and the support of the EL's work on responsible gaming initiatives.

The responsibility for prevalence studies usually rests with the state. However, Members shall co-operate with these studies where required.

These results shall also be used for the formulation of future responsible gaming measures.

II. EMPLOYEE TRAINING

Members are to ensure that employees are educated and informed about responsible gaming. Employees shall be trained on responsible gaming and be provided with insight into what might lead to problem gaming.

Members shall provide all employees with information on their responsible gaming programmes through appropriate communication channels at least annually.

Members shall ensure information is current and reviewed at regular intervals, i.e. annually.

Members shall ensure that an appropriate level of awareness relating to responsible gaming is maintained throughout the organisation, so that responsible gaming is made an integral part of daily operations.

Relevant employees (including temporary staff and contract staff) shall, based on job demands

and consumer interaction, receive training on responsible gaming, including (where applicable) training on treatment referral for potential problem players. Preference should be given to specialist training providers for the provision of this training.

Training should be provided to consumer service employees on the issues of problem gaming to ensure the prompt and efficient handling of self-exclusion and cooling-off. Refresher courses should be undertaken as and when needed but at least once a year.

Where a legal age of gaming exists in any jurisdiction, all employees that sell lottery products shall receive training that enables them to request validation of a person's age through appropriate means (i.e. ID or secondary forms of identification), including training on the process to follow in the event that a need for additional verification is identified.

The CSR department, Compliance Officer and/or equivalent responsible group should continuously monitor that the proposed training has been completed.

III. SALES AGENTS' PROGRAMMES

All sales agents shall be provided with information materials (e.g. brochures, leaflets, posters etc.) in order to raise their awareness of responsible gaming and to educate them on issues relating to responsible gaming and problem gaming.

Members shall ensure that sales agents are informed (in writing) that they are prohibited from offering credit facilities to players, excluding (in some jurisdictions) the acceptance of credit cards.



Where Members offer self-exclusion facilities, such as a player card, sales agents shall be informed (in writing) how the schemes operate and can be activated/removed by, or for, players.

Before new sales agents are allowed to sell Members' products, they shall be provided with training on responsible gaming. Tailored training may be provided to retailers depending on the range of products they sell on behalf of Members (i.e. specific training should be given to retailers providing EGM's). Preference should be given to specialist training providers for the provision of this training.

Members shall, where applicable, regularly assess the feasibility of providing training to sales agents in respect of treatment referral and the subject of problem gaming.

Members shall review the adequacy and effectiveness of sales agents responsible gaming programmes at least annually.

IV. GAME DESIGN

Before launching every new type of product/service, Members shall conduct a social impact assessment using a structured assessment process to examine relevant risk factors. Members shall implement effective strategies to minimize the negative impact of these risk factors. The risk factors shall be documented and any harm-minimization strategies clearly recorded so that the assessment can be reviewed as necessary.

Thus, Members need to be aware of the risk factors related to problem gaming at product level (e.g. event-frequency, win probability, near-miss,

...), at situational level (e.g. location and number of gaming venues) and at organizational level (e.g. marketing and advertisements).

Members shall only operate new types of products/services that are assessed (during the social impact assessment) to be 'high-risk' if doing so will enable an existing risk in the marketplace (i.e. if a product or service operated by someone other than the Lottery Member) to be reduced or regulated more effectively by the Lottery Member.

Members shall consider whether any social impact assessment, but particularly those that indicate a 'high risk' product/service, should be supported by verification from an independent third party, and document the decision/outcome as part of the social impact assessment.

Voluntary self-exclusion options should be built in wherever operationally possible or possible under the laws of the country for any player (and not just for those that have a gaming problem).

V. REMOTE GAMING CHANNELS

Consumer verifications mentioned hereafter will be conducted following a formal and documented process.

As a minimum, consumer registration requires a consumer to provide name, age, address and unique username and password. Whenever possible, third party verification systems shall be used by Members to check information provided, and/or eligibility to play.

Where applicable and depending on the products offered, Members shall ensure that their remote



gaming platforms (internet, digital TV, mobile devices) include, according to jurisdiction rules, e.g.:

- Proof of address

Proof of address provided by a consumer shall formally be checked by Members and/or third party, before the consumer is considered “fully registered”.

- Age restriction & verification system

Age of consumer shall formally be checked by Members and/or third party (according to jurisdiction rules), before the consumer is considered “fully registered” by the Member.

It shall be made clear, that no underage gaming shall be accepted, through “no under” 16’s, 18’s or 21’s sign (according to jurisdiction rule) and a clear message about underage gaming shall be displayed.

Members shall follow a clear documented policy if an underage player is identified, including refunding deposits and what to do with stakes and winnings.

Members shall promote the use of a recognized filtering programme to enable consumers/ parents to prevent minors from accessing gaming site(s).

Where there is no law regarding underage gaming in a given jurisdiction, warnings on the risks of underage gaming should be made by the Lottery and the Member should do its best to not accept such underage gaming.

- Consumer-led and/or system default limits on play, spend, deposit, and/or losses

Some mandatory limits (either set by user or defaulted by the Lottery) have to be defined before consumer is allowed to play. The consumers shall have all opportunities to

modify their limits. Decreasing a limit will be effective with no delay. Increasing a limit shall take place after a minimum cooling off period (24 hours for instance).

- Non-credit facilities

A Member shall never allow a negative balance on any consumer account.

- Voluntary self-exclusion options for players

Voluntary self-exclusion procedures shall be clearly documented on the website. Players shall be given the opportunity to voluntarily self-exclude themselves through the website. Additionally, self-exclusion could also be available through consumer services.

No marketing will be specifically aimed at self-excluded consumers while excluded.

- Reality check on the game screen (e.g. session clock, warnings relating to limits, cool off/ breaks) between periods of play

For some games, where time is important, (e.g. high frequency draws competition between players such as poker play...), information about connection time and/or a clock should be permanently displayed on all pages. Depending on the type of game played, a consumer should be offered the option to add other reality checks such as warnings related to limits and/or time spent during a session (especially during a competition between players where time spent can become an issue).

Players should also have access to information about their gaming activities through all means (such as Web, mobile, tablets, digital TV, etc.) on which they are able to play, for example:

- Account balance,
- Stakes over a given period of time (session, day, week, month, ...)
- Winnings, losses, deposits, ...



To further inform consumers, each game should clearly end with its result: win or loss and a minimum time between two games should be set up (e.g. 10 seconds).

A logo or other warning should be included on all pages of the website, to inform players about gaming risks.

- **Data protection controls**
The Member shall do its best to protect consumer privacy and shall document its privacy policy on website. Among others, consumers shall be offered the option to forbid disclosure of their personal information to any third party for marketing purposes and to correct their personal data. Generally, greatest care shall be taken to protect all consumers' personal data.
- **Financial value of wagers shall be displayed**
Financial value and currency on wagers shall always be displayed in order to provide the best information possible to consumer.
- **Self-assessment opportunities to help people to evaluate whether they are playing responsibly.**
Access to a responsible gaming page or sub-site, should be available from any page of the website:
 - an approved and simple self-assessment process (e.g., self-test) to determine risk potential,
 - explanations on how to remain a very low risk player.All responsible gaming information should be available in all languages in which one can play.
- **Links on every webpage to provide information about responsible gaming, the Member's policies on responsible gaming, and sources**

of advice and support (e.g. helpline numbers, referral to treatment providers). Members shall ensure that contact centre staff are able to refer to these sources for advice and support.

VI. ADVERTISING AND MARKETING

Members shall not direct advertising at vulnerable groups (in respect of age, social status, or gaming habits).

The operators shall:

- avoid advertising that is targeted towards any underage individuals in any gaming adverts or promotional material
- not entice underage individuals to play,
- display clearly and visibly the statement about gaming prohibition to people underage
- not portray real or fantasy character specifically targeted to minors
- not place any ads during transmissions specifically dedicated to minors

Any commercial advertisements and promotional communication shall carry an age restriction warning where practical.

Members shall adopt an advertising and marketing code which ensures that advertising and sales promotion activities do not encourage underage or problem gaming and do not provide the player with misleading information such as a false impression about the odds of winning.

Members shall also comply with relevant voluntary or mandatory codes relating to the provision of their services.

Any third parties involved in the communication campaigns shall also comply with the code.



Members' own codes shall specify which mandatory and/or voluntary codes are applicable to the span of their operations.

The code shall ensure that advertising and marketing campaigns:

- do not offer unreasonable incentives for loyalty that are linked to winning more based on gaming more
- focus on entertainment and do not state or suggest that gaming is an alternative to work or a way out of financial difficulties
- limit the use of marketing promotions that reward the highest spenders
- display clearly terms and conditions applicable to promotional activities, stamp date and time, and do not unreasonably alter subsequent to the wagering activity
- only ever accurately represent the chances of winning, prizes and odds etc.
- exclude any content that is designed to exploit an individual's financial anxieties
- do not encourage consumers to chase their losses
- do not encourage discrimination on the basis of ethnicity, nationality, religion, gender, sexual orientation or age
- exclude any content that includes or encourages violence, sexually exploitative themes or illegal behaviour
- do not cooperate with, or support links to other commercials that are offering quick loans that can be drawn upon immediately for the purposes of gaming
- Provide an unsubscribe, or opt out, facility for any Email or SMS communication.

VII. TREATMENT REFERRAL

Members shall actively engage with organisations that specialise in responsible and/or problem gaming, treatment centres and/or health professionals in order to understand the problem player's perspectives on the impact of lottery products and related advertising on their situation.

Where treatment services exist in a jurisdiction, Members shall (unless an alternative organisation has been selected for this purpose in a jurisdiction) provide relevant information to players and sales agents and cooperate with providers regarding services available for problem players. Such information (contact details/helpline numbers) shall be available in printed form and should be clearly visible in gaming venues, as well as being available on Members' websites.

The applicability, adequacy and effectiveness of these arrangements shall be reviewed at least annually by Members.

VIII. PLAYER EDUCATION

Members shall include these features in information designed for players (including on remote channels):

- Games rules should be available to the consumer all times
- Where gaming is available in multiple languages, the rules and responsible gaming information must be available in the same languages
- Detailed information on the odds of winning on each game which allows people to assess the risks and benefits of playing



- The game prize structures must be available to the player
- The homepage of the Member's website shall clearly display age restriction measures e.g. no under 18s (as appropriate for the jurisdiction concerned)
- In case of no legal (or operator based) age-limit, there shall be statement telling the risks of underage gaming
- Information concerning responsible gaming and consumer protection shall be provided on website
- Information concerning age-limit, responsible gaming, consumer protection and information on where to get help in cases of problem gaming.

If the above information is not available in printed form in gaming venues (e.g. retail stores) Members shall ensure that details of how to obtain such information is clearly available to players/retailers (agents). Where material is available in printed form it shall be placed where it can be accessed discreetly. If ATMs are located in the location, leaflets shall be placed near to those.

IX. STAKEHOLDER ENGAGEMENT

Members shall regularly engage with their main stakeholders (such as faith groups, anti-gambling pressure groups, relevant charities, treatment specialists, social workers and academic researchers), formally and informally and include this in their reporting mechanisms. Engagement shall cover issues that are material to the stakeholders and the individual Member. A broad range of stakeholders should be included in such a process.

The engagement shall provide an opportunity

for stakeholders to voice relevant concerns or questions.

Members shall integrate the results of stakeholder engagement into their strategic-decision-making processes and shall feedback to relevant stakeholder(s) on the outcomes from engagement processes.

X. REPORTING, MEASUREMENT AND CERTIFICATION

Members shall report (or have agreed to begin reporting from a specified date) on the impact and breadth of their Responsible Gaming Programmes to their stakeholders. The reporting shall include policies for responsible gaming, targets, commitments and indicators and shall occur periodically.

Reporting shall be transparent using channels which are most appropriate and accessible for the targeted stakeholder audience.

Members shall arrange independent verification of their responsible gaming activities against these standards as specified in separate guidance relating to the EL certification process.

Members who have been certified before will have undertaken one partial assessment within the three year period of their certification.

XI. ELECTRONIC GAMING MACHINES (EGM'S)

EGM's shall include VLT's (Video Lottery Terminals), AWP (Amusement With Prizes), IVT's (Interactive Video Terminals) and EILs (Electronic Instant



Lottery). Members shall take into consideration that lottery games played via EGMs are potentially more likely to lead players to develop problem gaming than the usual lottery games.

When purchasing and installing new EGM games, the speed of the game should be considered with regard to the effect on the potential to induce compulsive gambling. Members shall have the option to control the speed of the game in order to select the appropriate speed (appropriate = discussed with specialists).

The EGM shall be placed in a central place. The EGM shall not be hidden and retailers shall be able to see the machines at all times (in order to prevent underage gaming). The EGM shall also be placed so that it is realistic for the personnel to react on violations.

The EGM shall have prevention messages when possible on screen. These messages should be defined together with RG specialists.

The EGM shall have (where applicable) the possibility to set time and/or money limits for the players.

The EGM shall offer the possibility to “cool off” for the players.

The EGM shall offer reality checks for the players (automatic cash-out after a certain amount, scrolling RG messages/pop-up reminders, spend statement, clock, etc.). (Where applicable)

The EGM shall offer automatic cash-out after big wins at certain levels of credit or a certain period of time or money spent.

The EGM shall offer a voluntary self-exclusion option for the players (where applicable).

Members shall offer specific RG training to EGM retailers.

Members shall not allow EGM retailers to play in their point of sale.

Members shall put the RG rules regarding EGM in the retailer’s contract.

EGM shall offer an age verification system.

The advertising shall be focused on entertainment and gaming in a responsible way.

The EGM or its surroundings shall be giving information about chance of winning or pay out.

Information provided at the EGM or in its surrounding shall make it clear that winning is purely a matter of chance and that a player’s skill or knowledge will not improve the odds.

Members shall provide the EGM players with information about how to contact a gambling helpline.

Members shall avoid serving alcohol to players while playing and players should not be served any free alcohol.

Members shall have all RG rules on EGM checked by mystery shoppers.